

Millbrae & Burlingame Shoreline Area Project NOP Comments Summary

On October 10, 2023, OneShoreline published a Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the Millbrae and Burlingame Shoreline Area Protection and Enhancement Project (Project), as well as notice of a Public Scoping Meeting on November 2, 2023. The NOP public comment period took place from October 10-November 30, 2023, during which agencies, organizations, businesses, and individuals were invited to comment on this NOP and the scope of topics to be included in the EIR. OneShoreline received 35 written comment letters and 13 verbal comments at the Scoping Meeting from regulatory agencies, affected property owners, and interested organizations and individuals. To more easily organize and analyze these comments, OneShoreline staff have categorized comments into the 30 topic areas (the top 9 are listed below), and broken down the written and verbal comments into separate comments in these topic areas, as documented in attached table.

Key topics highlighted in these comments include:

Comment Topic	Topic Definition	Number of Comments Received Related to this Topic
Process and Alternatives Analysis	The process to develop the Project thus far and the process going forward related to outreach, data collection, and alternatives analysis	128
Hydrology and Water Quality	Project benefits and impacts related to drainage, protecting from sea level rise, sedimentation, and other water quality issues.	92
Biological Resources	Project benefits and impacts related to specific bird, plant, and aquatic species and their habitats	90
Recreation	Project benefits and impacts related to recreation and public access	64
Land Use and Planning	Required permits and approvals for the Project, including consistency with existing land use plans	35
Tribal/Cultural Resources	Project impacts and data collection related to tribal and cultural resources	21
Tie-In Location	Issues related to where Project features will tie into locations in Millbrae, Coyote Point, or SFO property	20
Nature-Based Solutions	Project benefits and impacts related to incorporating nature-based solutions	17
Construction Methods	Issues related to how the Project will be constructed	16

Next steps: These general comment topics are planned to be addressed as some point in the Project development process (Pre-EIR, EIR, Design, Permits). To efficiently utilize OneShoreline’s limited Project resources, at this early stage of Project development, topics will be explored at the level of detail necessary to assess the feasibility or the relative impacts/benefits of Project alternatives. Then, as Project alternatives are screened and a narrowed set of alternatives are carried forward, topics will be analyzed in more detail.

At this time, OneShoreline does not have a preferred Project alternative identified. Based on the NOP comments, OneShoreline and its consultant team are now updating the October 2023 Alternative Feasibility Analysis and, in coordination with permitting agencies, conducting an analysis to identify the Least Environmentally Damaging Practicable Alternative (LEDPA) before beginning the EIR (the LEDPA determination is a requirement of the Clean Water Act and federal and state permits). This will be completed concurrently with the implementation of a Project outreach plan.

How to review the Millbrae & Burlingame Shoreline Project NOP Comments Summary Table: The attached table has 5 columns: 1) Commentor; 2) Commentor Affiliation (including agency, city, environmental/recreation organization, property owner, and individual); 3) Topic; 4) Comment (for written comment letters, comments were broken out based on OneShoreline staff analysis of distinct ideas); and 5) As of June 2024, when OneShoreline expects this comment to be addressed (Pre-EIR, EIR, Design, Permits), which is subject to change as the Project progresses.

For reference, the 35 NOP Comment Letters received are linked below:

Agencies & Cities	Property Owners	Environmental & Recreation Organizations		Individuals	
California Department of Fish and Wildlife	AnzaCo LLC	Citizens Committee to Complete the Refuge	Aqua Sports Swim Academy	Carlo Cardilli	Ken Poulton
California Department of Transportation, District 4	City and County of San Francisco, Office of the City Attorney	Joint Letter - CCCR, CBD, SAS, GF, SF Baykeeper, SCLPC	Boardsports California	Charlotte Goldstein	Kirk Lindstrom
Federal Aviation Administration, Western Pacific Region	San Francisco International Airport (SFO)	San Francisco Baykeeper	San Francisco Bay Trail Project	Danielle Weerth	Mark Moulton
Native American Heritage Commission	SPHERE Institute	Save the Bay	San Francisco Boardsailing Association (SFBA)	Erin Lennane	Mike Capuano
San Francisco Bay Conservation and Development Commission		Sequoia Audubon Society		Eugenia McCauley	Millbrae City Councilmember Ann Schneider
San Francisco Bay Regional Water Quality Control Board		Sierra Club Loma Prieta Chapter		Jeffrey Finn	Stephen Hiley
City of Millbrae				Karl Hoffman	Steyn Lodewyk

13 Verbal Comments Received at November 2, 2023, Public Scoping Meeting

Commentor	Commentor Affiliation	Topic	Comment	As of June 2024, when does OneShoreline currently expect this comment to be addressed? (Pre-EIR, EIR, 30/60% Design, Permits)
Amy Chung (Anza Co LLC)	Property Owner	Process - Outreach; Cost/Economic Impacts	<ul style="list-style-type: none"> •Was there outreach done to property owners in this area? •Who is paying for project if it affects their property rights? Impacts on property rights? Who pays for those impacts? 	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), 60% Design
Andrea Pappajohn	Individual	Monitoring and O&M; Proven Examples; Cost/Economic Impacts; Project Need	<ul style="list-style-type: none"> •Would the tidegates be opened twice a day? How would they be maintained if operated so frequently? Are there examples of a similar mechanism already in operation that can be used as reference? Fully supports project, but just curious. •Any potential for these to be damaged. How will these be maintained and who will pay for that? 	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR, Permits
Anthony	Individual	Recreation - Windsports; Bay Fill; Alternatives Analysis; Recreation - Fishing	<ul style="list-style-type: none"> •I am a windsurfer and user of Coyote Point. •Have concerns about filling in the Bay. •Recognize the challenging situation. •More insights on why was conceptual alternative 2 deemed insufficient? •Fisherman community in Coyote Point and impacts from project on recreational fishing? Restrict herrings from reaching certain areas and would impact fisheries. •Impacts on travelers during construction. •There is a lot of recreational fishing along the shoreline and Coyote Point. There is a herring fishery. Restrictions of herring reaching spawning. Natural Habitat impacts concern. •Concern on impacts on Bay users, residents, travelers during construction. 	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Recreation), 60% Design, Permits
Audrey Park (SFO)	Property Owner	Process - Outreach; Biological Resources - Bird Strikes; Biological Resources; Recreation; Hydrology and Water Quality; Alternatives Analysis - New Alternative; Biological Resources - Ridgway's Rail; Recreation - Offshore Trail; Monitoring and O&M	<ul style="list-style-type: none"> •There was no discussion or outreach with airport on property mostly owned by City & County of San Francisco. •Actively creating wildlife habitat that could have ecological and aircraft safety hazards; potential cost on human life if increased bird interference. •Concerned about impacts on sensitive natural communities and federally endangered and fully protected species. •EIR should discuss access to trail and frequency of maintenance. Who's responsible? •Concern about construction-related air quality impacts on adjacent and nearby sensitive receptors. •Hydrodynamic modeling and wave modeling should be conducted. Concerned about sediment transport, water quality impacts, sedimentation from lagoon, and frequency of dredging lagoon. •Consider alternatives off property of City & County of San Francisco. •Creating new wildlife habitat does not align with SFO Plan. Identifies safety issues associated with attracting birds. Should identify impacts to bio habitat. Identify impacts to California Ridgway's Rail. EIR should address how this impact should be addressed. •Offshore barrier could pose safety concerns associated with a trail. Should discuss where access to trail would be, maintenance, and responsibility. •Wave modeling should be conducted to changes to the Bay. Analyze impacts related to sediment transport. Sedimentation from Lagoon (stormwater). How often should it be dredged? Analyze a project not within City & County of San Francisco lands. 	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR (Recreation, Biological Resources), Permits
Eric Lennen	Individual	Recreation - Windsports; Process - Outreach	<ul style="list-style-type: none"> •Project would carve out recreation area used for last 30 years - no more windsurfing? •Wants to "change/impact the process" in terms of project design details. •They use Coyote Point and were impacted by the Foster City Sea Wall. This project effectively cuts off wind surfing. Causes us great concern. We would like something that carves out areas we have been using for the last 30 years. I don't speak for everybody. A serious issue for us. 	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), EIR (Recreation)

Commentor	Commentor Affiliation	Topic	Comment	As of June 2024, when does OneShoreline currently expect this comment to be addressed? (Pre-EIR, EIR, 30/60% Design, Permits)
Evan Adams	Individual	Process; Hydrology and Water Quality; Recreation - Windsports; Noise; Cost/Economic Impacts; Biological Resources - Birds	<ul style="list-style-type: none"> •Notice was insufficient, and insufficient time for review. •In Foster City, polluted beaches there, lack of studies and regulation on development pollution of lagoon, mitigations on any findings on impacts to the Bay. •What about hydrodynamics studies, circulation studies, and sedimentation studies? •Water quality should be studied, sound effects studied and released, study on increased development along shoreline, impacts on recreational wind patterns, economic impacts to SFO expansion limitation, expensive to dredge and cleanup. •I really believe that Notice was insufficient. You had to dig and find it in events. It should be re-agendized. The report dump provides insufficient times. •In Foster City, where the lagoon is most polluted, an issue was not doing wind studies in the past and seeing how it affects recreation. Full sediment, hydrology, and other studies are needed. •Further, the California Water Monitoring Council has not been updating, they should be consulted. Who is going to pay for test sites. The risks for e-choli, fecal matter, water quality should be studied. •Noise effects should be examined in relation to SFO. •Should this project go forward, a study should be done about the increased development that could occur, including demand for housing because of that. •Should also study wind patters from future development. •Economic study should also be done. •Should also study migratory birds and Canadian geese. 	<p>NOP Comment Period Extended</p> <p>Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR (Recreation, Noise, Hydrology and Water Quality), Permits</p>
Gail Raabe (CCCR)	Environmental Organization	Bay Fill; Biological Resources; Hydrology and Water Quality; Hydrology and Water Quality - Algal Blooms/Eutrophication; Process	<ul style="list-style-type: none"> •Regarding project (conceptual alternative 3), have concerns about ecology, Bay fill, impacts to water quality, sedimentation, and harmful algal blooms that could kill fish. •NOP posting was not adequate. Five reports were not posted until the morning of the meeting; need more time to adequately review documents and request deadline for written comments be extended 2 weeks. •Will be submitting detailed comments to consider and analyze. Focus is on Conceptual Alternative 3 that would build an offshore barrier. This unprecedented proposal raises ecological concerns, Bay fill, water quality, sedimentation, algal blooms. Shortcoming in public process. The NOP has a one paragraph description of it. Requested reports be available to inform. Although some of these documents were made available on 10/25. Five important reports were not made available until today, including the Feasibility Report. Reports total 500 pages. The public deserves the time and opportunity to review this new information. Request the deadline be extended for another 2 weeks. 	<p>NOP Comment Period Extended</p> <p>Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits</p>
Gita Dev (Sierra Club)	Environmental Organization	Nature-Based Solutions; Bay Fill; Process; Process - Land Rights; Hydrology and Water Quality	<ul style="list-style-type: none"> •We are working as advisors to BCDC and Plan Bay Area Program. Figuring out how to put nature first as sea levels rise. •Conceptual Alternative 3 effect on hydrology of Bay and filling it in. •Believes request is reasonable to extend NOP comments deadline to allow proper review. •Whether dotted line rock barrier is on private property or State lands? •Which agencies were consulted and will be consulted? •Is the orange line in Conceptual Alternative 3 a levee or trail? •Will there be more technical studies during 2024 that will be released to public? 	<p>NOP Comment Period Extended</p> <p>Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits</p>
Jeffrey Finn	Individual	Recreation - Windsports; Recreation - Trail; Hydrology and Water Quality; Recreation - Offshore Trail; Nature-Based Solutions	<ul style="list-style-type: none"> •Minimal recreation requirements for kiteboarding and windsurfing should be implemented. •How is the project working with the State Conservancy? How will it incorporate the Bay Trail? •Impacts on Bay currents? Sand shifting and water movements when tidegates are in operation? •How are you going to work with incorporating Bay Trail and Bay Water Trail? How are you going to work with conflicts with other agencies? Would like to see soft armoring and not hard armoring. If you close the gates, that water has to go somewhere; how does that affect hydrology of the Bay and sedimentation? 	<p>Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Recreation, Hydrology and Water Quality), Permits</p>
Joe Teresi	Individual	Recreation - Trail; Monitoring and O&M	<ul style="list-style-type: none"> •I am a user of the Bay trail. Make more aesthetic and ecologically thriving. Want EIR to explore: <ul style="list-style-type: none"> - ways to improve and make trail more attractive - separate cyclists and pedestrians - move trail further from water - More overlooks - Fishing piers •Who is maintaining this new infrastructures? •Hopeful that under Conceptual Alternatives 2 or 3 that the Bay Trail experience can be enhanced. 	<p>Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR, Permits</p>

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Joyce Courtney (Sequoia Audubon)	Environmental Organization	Biological Resources - Habitat; Process - Outreach; Process	<ul style="list-style-type: none"> •Will submit formalized comment. Reports were provided within the last week. •Impacts on salt marsh and mudflats, which is important habitat from September through April. Consultants studied in July, which is least biologically diverse time of the year. 166 species of birds reported and recorded on the Burlingame coast. •Only identified habitat and potential species, did not include impact statement, sedimentation and impacts on photosynthesis. EIR will need to address impacts on ecosystems and wildlife. •Are you working with local specialists such as ornithologist's and biologists? Are you working with other technical specialists? •Request extension on comments deadline. 	<p>NOP Comment Period Extended</p> <p>Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits</p>
Ken Poulton	Individual	Recreation - Windsports; Aesthetics - Viewshed	<ul style="list-style-type: none"> •Coyote Point a popular spot in South Bay for windsurfing, only beginner friendly launch because of wide sand beach, consistently usable. •Wind-sports barely use the area inside the levee, they just need access to the areas beyond the levee. •Levees would destroy scenic view from the Bay Trail, water will become too shallow to windsurf, hassle to get past levees if want to continue windsurf, getting past levees is hazardous, filling in the Bay not preserving it, quadruple amount of Bay that's filled in this area, EIR has to take into account recreation and preservation of public access/safety, not feasible to protect watersports. 	<p>Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation, Aesthetics), Permits</p>
Maria Zlatnik	Individual	Project Need; Equity/Environmental Justice; Hydrology and Water Quality; Hydrology and Water Quality - Shallow Groundwater Rise; Hazards and Hazardous Materials	<ul style="list-style-type: none"> •Concerned about climate change; there was flooding along El Camino years ago. •Address environmental justice explicitly. Communities more at risk are frontline communities. •Impacts on shores of Oakland and other parts of the Bay? •Use data from UC Berkeley toxic tides, whether chemicals would be released in the Bay/impact humans/animals with rising waters and if project proceeds? •We lost some of our Millbrae community with one of the big storms along El Camino. Two things I am hoping the Plan will address. <ul style="list-style-type: none"> - The issue of environmental justice. Although there are not major environmental justice communities, there are communities more at risk, and those are ones otherwise burdened with other issues. Will this affect the shore along other areas of the Bay? - EIR should look at the data related to UC Berkeley toxic tides project. Concern related to toxic chemicals being buried underground and whether these chemicals could be released and affect humans/animals with rising sea waters. Will this project affect which toxic chemicals can be released? 	<p>Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), EIR (Hazards and Hazardous Materials, Hydrology and Water Quality), NEPA (Environmental Justice), Permits</p>

Written Comments Received from 35 Comment Letters

Commentor	Commentor Affiliation	Topic	Comment	As of June 2024, when does OneShoreline currently expect this comment to be addressed? (Pre-EIR, EIR, 30/60% Design, Permits)
AnzaCo LLC	Property Owner	Project Need	We have closely followed the One Shoreline planning process and appreciate the importance of the long term future of the Bayfront in Burlingame, as well as the contiguous shoreline throughout the Bay. As a small business, we have invested well over \$1M in improvements to our property to prevent storm damage since 1993, as we do experience occasional drainage issues when the volume of actively falling rain exceeds the capacity of available storm drainage. These improvements have included surface water pumping systems, back-up generators, larger transformers and an upgraded electrical system to provide more reliable power and internet connection. Power and internet fail often in windy conditions (with and without rain) in our neighborhood. We are excited that One Shoreline is studying a regional solution that will provide effective and permanent mitigation to sea level rise and alleviate our ongoing operating expenses and climate change concerns.	Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), EIR
AnzaCo LLC	Property Owner	Process - Outreach; Cost/Economic Impacts	Our area of the City has been and will continue to be the economic engine for the City, and it is critical that the planning balances sensible requirements for resiliency while maintaining the potential for design creativity and long-term economic development...It will be critical for us to understand and provide input on the financing strategy for the shoreline protection improvements. The strategy must provide as much certainty as possible to private property owners who could be directly impacted.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), 60% Design
AnzaCo LLC	Property Owner	Proven Examples; Cost/Economic Impacts	The preferred option and alternative options, while more common in other parts of the world, represent new engineering approaches for our area. We are concerned that the burden for innovative shoreline protection improvements may impact our property disproportionately, such that our development becomes financially and otherwise infeasible...We believe the final selected option should be well-designed and engineered, a proven solution used elsewhere, financially feasible to build and operate and not excessively burdensome to private owners.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), 60% Design
AnzaCo LLC	Property Owner	Land Use and Planning - Consistency with Burlingame Zoning	We would like to see a comprehensive approach that includes removal of constraints previously imposed upon our property to address sea level rise that may no longer be valid. We are particularly concerned about the currently - imposed 100' Buffer Zone and setback planned for sea level rise protection infrastructure along Burlingame Lagoon per Burlingame Zoning Code section 25.12.050. If this Buffer Zone becomes functionally optional, we believe it should be removed.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Land Use and Planning)
AnzaCo LLC	Property Owner	Hydrology and Water Quality - Local Drainage	We request that the EIR to study the following: Solutions to improve stormwater management in our neighborhood, and to ensure reliable electrical infrastructure for properties along Airport Boulevard so that power and internet service do not go out in windy conditions and/or rainstorms.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
AnzaCo LLC	Property Owner	Transportation	We request that the EIR to study the following: Confirm that Burlingame Lagoon is not navigable or accessible for boats, especially with the proposed offshore sea wall.	Pre-EIR (LEDPA), EIR (Transportation)
AnzaCo LLC	Property Owner	Land Use and Planning - Consistency with Burlingame Zoning	We request that the EIR to study the following: Study that sea wall and associated setbacks will not be required along the Burlingame Lagoon, as in 52 years there has not been any flooding along the lagoon side of our property. This is especially true if the mitigation along the bayshore works as designed.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Land Use and Planning)
AnzaCo LLC	Property Owner	Cost/Economic Impacts	We request that the EIR to study the following: Funding and other collaborative options from Federal and State sources, in addition to County and City-level funding as we believe that this is a regional problem that requires a more concerted approach.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design
AnzaCo LLC	Property Owner	Proven Examples	We request that the EIR to study the following: Examples of the proposed offshore seawall and gate solution, both successful and unsuccessful, to help ensure the final selected solution will be successful.	Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan)
Aqua Sports Swim Academy	Recreation Organization	Tie-In Location - Coyote Point; Recreation	Optional Offshore Barrier Extension to San Mateo – cutting across Coyote Point Beach. With this extension in place as proposed, most all recreational use will not be possible – the exceptions being swimming and fishing. Therefore, the Optional Extension to Coyote Point is not feasible.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), EIR (Recreation), 30/60% Design
Aqua Sports Swim Academy	Recreation Organization	Recreation - Windsports	This part of the San Francisco Bay is unique with consistently strong thermally generated winds. Coyote Point has been a world class destination for windsurfing and all evolving windsports since the early 1980's. Steps must also be taken to preserve and protect this watersport and all other San Francisco Bay recreational activities.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation)
Aqua Sports Swim Academy	Recreation Organization	Tie-In Location - Coyote Point; Alternatives Analysis - New Alternative	Our goal is to collaborate with OneShoreline and create a solution that works for everyone. We have prepared some diagrams showing modifications to the proposed Alternative 3. These concepts support flood control without hindering or eliminating our access to open water. The modifications also support, and possibly enhance, plans in place to create Bay Rise Park (Sphere Institute sponsored project) mentioned on Page 50, 4.1.1.4 Structural Floodwalls, of Schaaf & Wheeler Feasibility Analysis. Our hope in providing these conceptual diagrams along with scoping comments, is to enable OneShoreline to address the feasibility of these modifications during the EIR process.	30% Design, Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), 60% Design
Aqua Sports Swim Academy	Recreation Organization	Tie-In Location - Coyote Point; Recreation	Specific Issues with proposed Alternative 3 – Optional Offshore Barrier extension to Coyote Point: Area is too small and eliminates access to the open Bay. Most current water activity users access the open bay from Coyote Point Launches.	30% Design, Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), 60% Design
Aqua Sports Swim Academy	Recreation Organization	Tie-In Location - Coyote Point; Recreation - Windsports	Specific Issues with proposed Alternative 3 – Optional Offshore Barrier extension to Coyote Point: Open water not accessible from a parking lot and rigging area. No way to get gear to levee/barrier. Levee not designed to drive, park, and rig gear.	30% Design, Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), 60% Design, EIR (Recreation)

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Aqua Sports Swim Academy	Recreation Organization	Tie-In Location - Coyote Point; Recreation - Windsports	Specific Issues with proposed Alternative 3 – Optional Offshore Barrier extension to Coyote Point: The current wind shadow created by Meta Buildings negatively impacts near shore activities.	30% Design, Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), 60% Design, EIR (Recreation)
Aqua Sports Swim Academy	Recreation Organization	Tie-In Location - Coyote Point; Recreation - Windsports	Specific Issues with proposed Alternative 3 – Optional Offshore Barrier extension to Coyote Point: Water levels at low tide also negatively affect the near shore activities.	30% Design, Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), 60% Design, EIR (Recreation)
Aqua Sports Swim Academy	Recreation Organization	Cost/Economic Impacts	Specific Issues with proposed Alternative 3 – Optional Offshore Barrier extension to Coyote Point: Retail business on-site at Coyote Point, Boardsports California, would be severely impaired. Boardsports has been providing lessons, rental gear, equipment purchase, and support, at Coyote Point since 2007.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design
Aqua Sports Swim Academy	Recreation Organization	Recreation	List of current recreational activities (Items 1 – 6 utilize the open bay waters): 1) Windsurfing and Wind Foiling 2) Kitesurfing and Kite Foiling 3) Wing Foiling, SUP Foiling & E Foiling 4) Stand Up Paddling 5) Kayaking 6) Outrigger Canoeing 7) Swimming 8) Fishing	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation), 60% Design
Aqua Sports Swim Academy	Recreation Organization	Recreation - Vehicle Access	All the above watersports require vehicle access. Wind sports/water craft activities use large gear, need rigging area, and ramp access before, during, and after the activity.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation), 60% Design
Aqua Sports Swim Academy	Recreation Organization	Recreation - Windsports	Proposed Alt. 3 Offshore Barrier/Levee – issues: Primary and Lower Use wind sports areas are cut-off leaving no open bay access	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation)
Aqua Sports Swim Academy	Recreation Organization	Recreation - Windsports	Proposed Alt. 3 Offshore Barrier/Levee – issues: Area inside lagoon, in proposed configuration, is too small downwind given prevailing wind direction – severely restricting use	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation)
Boardsports California	Recreation Organization	Tie-In Location - Coyote Point; Recreation - Windsports	This proposal would completely destroy wind sports access to one of the best wind sports sites in the SF Bay. We vehemently object to this solution of building an offshore barrier at Coyote Point Park.	30% Design, Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), 60% Design, EIR (Recreation)
Boardsports California	Recreation Organization	Existing Conditions	The San Francisco Bay is one of the best wind sports areas in the world. Enthusiasts come from all over the bay and the world to enjoy the wonderful conditions available in the SF Bay and specifically at Coyote Point Park. This site provides access to one of the primary spots for windsurfing, kitesurfing, and wing foiling. The site is popular due to side on shore winds, deep enough water at lower tides to launch wind/kite/wing surf and foil equipment, and the proximity to millions of residents who wish to access the SF Bay for recreation.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Project Setting)
Boardsports California	Recreation Organization	Existing Conditions	Coyote Point is the second most popular site for wind sports in the South Bay, in use since the 1980's. Its wide sand beach makes it the only beginner-friendly launch in the South Bay. Relatively deep water makes it the only consistently usable launch in the South Bay. Beaches and amenities for swimming and beach use were rebuilt in 2020-2022, with high use in summer months.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Project Setting)
Boardsports California	Recreation Organization	Aesthetics - Viewshed	An 18' levee would destroy the scenic view of the Bay from the ~12' Bay Trail.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Aesthetics), Permits
Boardsports California	Recreation Organization	Recreation; Hydrology and Water Quality - Sediment/Turbidity	The area inside the levee would silt up rapidly, soon becoming too shallow for swimmers and wind sports.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Boardsports California	Recreation Organization	Recreation - Windsports	The area inside the levee is too small for wind sports and has bad wind due to Meta buildings.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation)
Boardsports California	Recreation Organization	Recreation - Windsports	Getting to the levee would require walking 1000 feet through mud. Getting over a riprap levee would be hazardous, and extremely hazardous for kitesurfers.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation)
Boardsports California	Recreation Organization	Recreation; Hazards and Hazardous Materials	Anyone injured on the levee would be difficult to reach.	EIR (Hazards and Hazardous Materials)
Boardsports California	Recreation Organization	Hydrology and Water Quality - Sediment/Turbidity	Lagoon areas will quickly fill with silt. A salt pond with levee openings at the Dumbarton Bridge has silted in from low-tide level to near the high-tide level in just 13 years. The result is that offshore levees amount to new Bay fill.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Boardsports California	Recreation Organization	Proven Examples	Are the proposed tide gates realistic? Existing reports provide no examples of the proposed tide gates. Relying on multiple gates to open and close daily in a salt water environment may put tidal protection at risk.	Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan)
Boardsports California	Recreation Organization	Hazards and Hazardous Materials; Recreation	Any offshore levee at Coyote Point must be specially designed to preserve access and safety. It's not clear this is feasible.	EIR (Hazards and Hazardous Materials)
Boardsports California	Recreation Organization	Alternatives Analysis - New Alternative; Tie-In Location - Coyote Point	Onshore Alternatives for Coyote Point - CP1: Raise the Coyote Point Promenade to 18'; CP2: Build a 6' inland levee	30% Design, Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), 60% Design

Commentor	Commentor Affiliation	Topic	Comment	As of June 2024, when does OneShoreline currently expect this comment to be addressed? (Pre-EIR, EIR, 30/60% Design, Permits)
California Department of Fish and Wildlife (CDFW)	Agency	Biological Resources - Fish	Protected species under the State and Federal Endangered Species Acts that could potentially be present near Project activities include: Chinook salmon (<i>Oncorhynchus tshawytscha</i>), state and federally threatened (Central Valley Spring-run), state and federally endangered (Sacramento River Winter-run); Longfin smelt (<i>Spirinchus thaleichthys</i>), state-threatened; Steelhead (<i>Oncorhynchus mykiss</i>), federally-threatened (Central California Coast and Central Valley ESUs); Green sturgeon (<i>Acipenser medirostris</i>), federally-threatened (southern DPS); White sturgeon (<i>Acipenser transmontanus</i>), state species of special concern Several species with important commercial and recreational fisheries value and habitat value that could potentially be impacted by Project activities include: Dungeness crab (<i>Cancer magister</i>); Pacific herring (<i>Clupea pallasii</i>); Surfperches (<i>Embiotocidae</i>); California halibut (<i>Paralichthys californicus</i>); Eelgrass (<i>Zostera marina</i>)	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
California Department of Fish and Wildlife (CDFW)	Agency	Biological Resources - Fish; Biological Resources - Wildlife Migration and Movement	The creation of a Lagoon Barrier...blocks aquatic species from reaching potential and known habitat. Species of particular concern would be Pacific herring, which have been documented to spawn in this area, and Longfin smelt which is a state threatened species.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
California Department of Fish and Wildlife (CDFW)	Agency	Process - Lack of Detail in NOP; Construction Methods	Additionally, as the NOP does not provide specific information of the construction methods that would be required to construct the barrier, shoreline features, and tide gate, such a large undertaking would likely include methods which the Department has determined may cause take of state listed species.	Pre-EIR (Updated Alternatives Feasibility Analysis), 60% Design, EIR
California Department of Fish and Wildlife (CDFW)	Agency	Alternatives Analysis	The Department recommends that the DEIR describe in detail why the Lagoon Barrier as proposed, must isolate such a large area of the bay and why shoreline protection measures along the existing shoreline are not feasible or not the preferred option.	Pre-EIR (Updated Alternatives Feasibility Analysis)
California Department of Fish and Wildlife (CDFW)	Agency	Construction Methods	The Department recommends the DEIR include specific information on the methods that will be used to construct the barrier and other project features. Methods of particular interest to the Department will include pile driving and dredging.	Pre-EIR (Updated Alternatives Feasibility Analysis), 60% Design, EIR
California Department of Fish and Wildlife (CDFW)	Agency	Biological Resources - Habitat; Process - Stable Project Description	The Department recommends the DEIR provide specific details in the discussion of the Lagoon Barrier on the type of habitat proposed for creation, features that will create this habitat, and the purpose of each habitat type.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
California Department of Fish and Wildlife (CDFW)	Agency	Biological Resources - Fish; Pumping	The Department recommends the DEIR provide discussion on the types of pumps and intakes that may be employed by the Project and the measures that would be taken to avoid that will be employed to avoid and or minimize impacts to aquatic species. Measures should include discussion on fish screens capable of avoiding impingement and entrainment of Longfin smelt.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 30/60% Design, EIR (Biological Resources), Permits
California Department of Fish and Wildlife (CDFW)	Agency	Biological Resources - Eelgrass	The Department recommends that the DEIR include discussion regarding potential impacts to eelgrass from the creation of the Lagoon Barrier. Additionally, the DEIR should include avoidance and minimization measures consistent with the California Eelgrass Mitigation Policy (attachment 1).	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
California Department of Transportation, District 4 (Caltrans)	Agency	Land Use and Planning - Permits and Approvals	One of the goals of the Caltrans Aeronautics Program, is to assist cities, counties, and Airport Land Use Commissions or their equivalent (ALUC), to understand and comply with the State Aeronautics Act pursuant to the California Public Utilities Code (PUC), Section 21001 et seq. The proposed project is in the Airport Influence Area B – Land Use Policy Action/Project Referral Area of the San Francisco International Airport, established by the San Mateo County ALUC pursuant to Section 21675(c). Therefore, the proposed project shall adhere to the safety and land use criteria and restrictions defined in the Airport Land Use Compatibility Plan formed by the ALUC pursuant to the PUC, Section 21674 and Section 21676 and is subject to review authority by the ALUC...The Lead Agency must submit its plans to the ALUC for a consistency determination according to the State Aeronautics Act's statutory procedure. An Airport Land Use Compatibility Plan (ALUCP) is crucial in minimizing noise nuisance and safety hazards around airports while promoting the orderly development of airports, as declared by the California Legislature. A responsibility of the ALUC is to assess potential risk to aircraft and persons in airspace and people occupying areas within the vicinity of the airport.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Land Use and Planning), Permits
California Department of Transportation, District 4 (Caltrans)	Agency	Process - Outreach	Caltrans D4 does not yet have projects scheduled for this section of US-101 to address sea level rise but would like to coordinate with the local partners and OneShoreline as we develop strategies that address impacts to US-101.	Pre-EIR (Outreach Plan)
California Department of Transportation, District 4 (Caltrans)	Agency	Transportation	Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits.	Pre-EIR (LEDPA), EIR (Transportation)
California Department of Transportation, District 4 (Caltrans)	Agency	Transportation	As the Lead Agency, OneShoreline is responsible for all project mitigation, including any needed improvements to the State Transportation Network.	Pre-EIR (LEDPA), EIR (Transportation)

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Carlo Cardilli	Individual	Tie-In Location - Coyote Point; Recreation	I wanted to put in writing my strong opposition to Conceptual Alternative #3. I live in San Carlos, I'm a king time member of Save The Bay, and a frequent recreational user, from running and biking along the shore to sailing out of Coyote Point.	30% Design, Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), 60% Design, EIR (Recreation)
Carlo Cardilli	Individual	Bay Fill	Conceptual Alternative #3 is a further reduction of the natural Bay, creating another lagoon where none should be. We should be restoring the natural wetlands of the bay instead of further reducing them.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), Permits
Carlo Cardilli	Individual	Alternatives Analysis	I also note that the Scoping Document dismissed Conceptual Alternative #1 as infeasible. I'd like to know the grounds for that decision, especially given that Foster City completed its seawall project that seems very in line with CA#1.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Charlotte Goldstein	Individual	Nature-Based Solutions	Using nature-based design elements significantly increases species settlement, richness, and abundance. Nature-based design elements and nature-based solutions allow a structure to actively provide carbon sequestration, decrease the magnitude and frequency of maintenance leading to increased structural lifespan.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), Permits
Charlotte Goldstein	Individual	Construction Methods; Nature-Based Solutions	Using ecological concrete as a mitigation measure and design alternative supports compliance with strict environmental regulations. The term "ecological concrete" is an alternative to traditional concrete where material composition enhances or encourages the growth of flora or fauna when placed in the marine environment. Ecological concrete may include recycled materials, such as recycled or reclaimed concrete, resulting in reduced greenhouse gas emissions as compared to traditional concrete.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR, Permits
Charlotte Goldstein	Individual	Construction Methods; Nature-Based Solutions	...all concrete materials should solely be fabricated from ecological concrete in order to minimize negative impacts and create marine habitat opportunities in the Millbrae and Burlingame Shoreline Area Protection and Enhancement Project.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR, Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Additional Reference	Additionally, we have participated as a stakeholder in the US Fish and Wildlife Service Tidal Marsh Ecosystem Recovery Plan, the San Francisco Bay Conservation and Development Commission Adapting to Rising Tides and Bay Adapt processes, the San Francisco Estuary Partnership, the San Francisco Bay Joint Venture and the South Bay Salt Pond Restoration Project. Our participation in these processes demonstrates our recognition of the threats posed by climate change and more specifically, sea level rise	Pre-EIR (Updated Alternatives Feasibility Analysis)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Process - Lack of Detail in NOP	The area where the barrier and lagoon would be sited is currently submerged bay, intertidal mudflat and tidal marsh. These existing habitats could be severely impacted or decimated by this project. Although the Project proposes to construct new habitat, details on how it would do so, and if it is even feasible, are not provided.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Regional Precedent	In addition to the serious potential impacts to water quality and Bay habitats in the immediate area offshore of Burlingame and Millbrae, the Project, as described in the NOP, represents an alarming threat to the health of the San Francisco Bay Estuary because it would set a dangerous precedent for similar barrier/lagoon projects offshore of urbanized areas around the Bay, reversing decades of work to return lands that have been diked off from the Bay, to tidal flows to restore the ecological health of the Bay.	Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Process - Lack of Detail in NOP	Due to the extremely limited and inadequate project description in the NOP, we relied on a number of OneShoreline documents to piece together pertinent information on the Project that could inform our NOP scoping comments. With the inconsistent numbering of various project alternatives between different reports this was very difficult. The Draft Environmental Impact Report (DEIR) must include a robust, clear, and stable project description with sufficient detail to ensure agencies, stakeholders and the public can easily grasp the elements of the Project.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Hydrology and Water Quality; Construction Methods	There is no question that the hydrology and water conditions offshore could significantly be altered from existing conditions during and after construction of the offshore barrier. For this reason, it is critical that the DEIR ascertains the baseline conditions with respect to water quality including temperature, salinity, nutrients, dissolved oxygen, circulation (both horizontal and vertical), volatile sulfides, sediment, toxins and turbidity, within and adjacent to the project area.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR (Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Hydrology and Water Quality - Under Multiple Scenarios	The DEIR impact analysis must determine not only if there will be any initial change in water quality conditions in the lagoon when the barrier is first constructed, but also any post-construction changes in these water quality conditions over time as the extent of tidal exchange is altered, and/or lagoon waters and habitats are impacted from the detention of stormwater and normal seasonal freshwater flows from the creeks into the lagoon.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Hydrology and Water Quality; Mitigations	Similarly, the DEIR impact analysis must identify, analyze and potentially mitigate adverse impacts of the proposed project on the areas outboard and adjacent to the Project Area.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Monitoring and O&M; Hydrology and Water Quality	The DEIR Mitigation Monitoring and Reporting Plan (MMRP) must identify who the responsible party(s) will be for periodic monitoring of water conditions in the lagoon, and what interventions would be necessary if water quality deteriorates to levels outside of water quality standards or limits with respect to harmful impacts to fish and wildlife or human health, e.g., formation of Harmful Algal Blooms (HABs), avian botulism, etc.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR (Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Monitoring and O&M; Hydrology and Water Quality	The MMRP should also monitor rate of introduction of coarse organic debris and sediment accumulation within the lagoon	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR (Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Monitoring and O&M; Biological Resources - Habitat	The MMRP should also report on the areal extent of tidal wetlands and other existing habitats within the artificially created lagoon.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR (Biological Resources), Permits

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Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Monitoring and O&M	In addition, the MMRP should track accretion or erosion of sediments in areas adjacent to the barrier.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR, Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Hydrology and Water Quality - Temperature; Hydrology and Water Quality - Salinity; Biological Resources	Analyze in the DEIR: Dramatic shifts in salinity and temperature, from freshwater flows being detained in the lagoon, that are outside of the tolerance range for organisms currently living in the Project area and migrating through the site. Upstream water retention basins could reduce creek flows into the lagoon during storm events and the DEIR should evaluate this strategy and provide information on its feasibility.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Hydrology and Water Quality - Circulation	Analyze in the DEIR: Changes to circulation. Can the lagoon be managed to avoid creating an environment conducive to poor water exchange with the bay and stratification within the water column?	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Hydrology and Water Quality - Algal Blooms/Eutrophication; Additional Reference	Analyze in the DEIR: Accumulation of excess nutrients and organic matter from upstream creeks can cause low oxygen levels in the water due to eutrophication, leading to fish die-offs. The Project Coastal Hazard Analysis mentions that the project lagoon would be, "like the Palo Alto Flood Basin". In 2002, a large fish die-off in the Palo Alto Flood Basin occurred due to low oxygen levels in the water attributed to accumulation of leaf litter following a rainstorm (https://www.grassrootsecology.org/from-the-field/2017/1/30/grassroots-ecology-palo-alto-creek-monitoring-program-celebrates-its-third-birthday). The DEIR must identify upstream sources of biological material that may accumulate in the lagoon and describe what steps will be taken to avoid low dissolved oxygen concentrations within the lagoon.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Hydrology and Water Quality - Algal Blooms/Eutrophication	Analyze in the DEIR: Harmful Algal Blooms (HABs)	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Hydrology and Water Quality - Sediment/Turbidity; Hydrology and Water Quality - Pollutants; Monitoring and O&M; Biological Resources - Eelgrass	Analyze in the DEIR: Construction of a barrier could have potentially significant and adverse impacts to sediment transport within the local area since the flows from the five local creeks to the Bay would be cut off during higher tides or King tides, during which time the sediment and coarse organic debris loads the creeks are carrying could settle within the detention basin/lagoon. Therefore, placement of an offshore barrier will likely result in the need to dredge the detention basin/lagoon. How will dredging affect eelgrass habitat the project proponent indicates may be established within the lagoon, water quality in terms of sediment toxins and turbidity. The DEIR must document existing sediment toxins and provide a strategy to avoid impacting water quality during dredging. How will sediment loss due to the wall be avoided as wave energy and currents are deflected off the wall?	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR (Biological Resources, Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Hydrology and Water Quality - Pollutants	There are many drainage pipes emptying into the bay along the shoreline, with evidence of algae growing at the pipe outfalls. What is the existing quantity and chemical composition of the effluent, and how will those chemicals/nutrients affect water quality within the lagoon?	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Tie-In Location - SFO; Biological Resources - Habitat	The western end of the Project offshore barrier would bisect the large tidal marsh near the airport before connecting to the shoreline levee. This marsh has confirmed nesting Ridgway's Rail. The barrier would permanently bisect the marsh habitat, impeding wildlife movement between the two areas, and for reasons identified above, adversely impact tidal marsh habitat.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), 30/60% Design, EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Habitat	All of the marshes internal to the proposed barrier would be within the created, artificial lagoon and would be subject to the hydrologic changes related to altered tidal flows and detention of freshwater flows from the creeks. Conversion of tidal marsh to other habitats must be identified in the list of direct and indirect impacts.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Habitat	All of the existing tidal wetlands outboard of the barrier wall could be adversely impacted from the proposed construction of a barrier wall as well.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Habitat	The DEIR must: Document the extent and location of existing salt marsh habitat in the area.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Habitat; Construction Methods	The DEIR must: Identify, analyze and propose mitigation for potential adverse impacts on marsh vegetation, hydrology and wildlife from construction activities.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Habitat	The DEIR must: Identify, analyze and propose mitigation for post-construction impacts resulting from building a solid wall through the existing marsh near the airport.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Habitat; Mitigations; Construction Methods	The DEIR must: Identify, analyze and propose mitigation for potential adverse impacts to existing tidal wetlands on the outboard side of the proposed barrier, not only from construction activities, but also the post-construction impacts of the proposed barrier including decreased local sediment supply and erosion from wave deflection from the proposed barrier.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Hydrology and Water Quality	The DEIR must: Identify, analyze, and propose mitigation for changes in the physical environment for the marshes and other habitats within the lagoon which could include changes in salinity, sedimentation, nutrients, toxics, temperature, changes in submersion/exposure time from the current tidal regime, and other water quality parameters that could affect this critically important habitat	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits

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Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Eelgrass	The DEIR must identify, analyze and propose mitigation for potential impacts resulting from the offshore barrier and the lagoon to the natural eelgrass beds that occur in subtidal habitat both inboard and outboard of the proposed barrier, as the impacts are likely to be different.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Eelgrass	As part of the DEIR analysis, surveys for eelgrass must be conducted to map the specific locations of the beds.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Eelgrass	Eelgrass grows between +1 ft MLLW and -6 ft MLLW6. How are those optimal depths going to be maintained within the managed lagoon?	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Eelgrass	Eelgrass is not tolerant of low water salinity. With the lagoon serving as a stormwater detention basin during high tide storm events, how would water salinity within the lagoon be maintained within the salinity tolerance range for eelgrass?	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Eelgrass	Eelgrass grows in a specific temperature range. How would water temperature within the lagoon be maintained within the temperature tolerances of eelgrass?	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Hydrology and Water Quality - Algal Blooms/Eutrophication; Biological Resources - Eelgrass	Algal blooms negatively impact eelgrass restoration projects. How would algal blooms be avoided in a lagoon with potentially reduced circulation, elevated nitrogen levels and water temperature?	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Eelgrass	Waves hitting the outboard side of the barrier wall, may create conditions outboard of the barrier that impact eelgrass beds such as turbidity and erosion.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Habitat; Mitigations; Construction Methods	Given the importance of intertidal mudflat habitat, the DEIR must: Document the extent of mudflat habitat in the Project area and identify potential adverse impacts and mitigation for the construction and permanent footprint of the barrier, including tide gates and pump stations.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Habitat	The DEIR must: Determine to what extent the barrier/lagoon would alter the natural tidal flow and exposure period for mudflat habitat within the lagoon area, analyze any impacts and provide measures to mitigate impacts.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Habitat; Construction Methods	The DEIR must: Determine not only construction, but also post-construction impacts of the construction of a barrier on the mudflats outboard of the proposed barrier.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Habitat	The DEIR must: Determine if dredging will be needed, the frequency of dredging episodes and how dredging would affect the quantity and quality (with respect to wildlife) of mudflat habitat within the detention basin/lagoon. Appropriate mitigation measures must be provided. Sediment essential to the stability of mudflats appears to be accreting in most of the project area (Coastal Hazard Analysis Figure 4-9). The placement of an offshore barrier could result in the need to dredge within the lagoon due to the sediment load transported by the five local streams.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Habitat	Sediment also appears to be eroding at the south end of the project area in Figure 4-9. It appears from Figure 2 in the NOP that the offshore barrier would cut through the area currently being eroded. The DEIR must study the impacts of putting a solid barrier through the erosional area on the sediment levels, and how any acceleration of sediment loss due to the barrier wall can be mitigated.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Habitat; Hydrology and Water Quality - Under Multiple Scenarios	The DEIR must determine to what extent the Project offshore barrier/lagoon would alter the natural tidal flow and exposure period for mudflat habitat within the lagoon area, both initially and as sea levels rise, analyze any impacts and provide mitigation measures.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Ridgway's Rail; Biological Resources - Habitat; Tie-In Location - SFO	The bird's marsh habitat would be bisected by the proposed barrier with a portion of the tidal marsh habitat that supports this species falling within the Project's artificial lagoon...The rails would be subjected to...loss of habitat connectivity.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), 30/60% Design, EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Ridgway's Rail; Noise; Construction Methods	The rails would be subjected to noise and human disturbance during construction.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR (Biological Resources, Noise), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Ridgway's Rail; Biological Resources - Habitat; Hydrology and Water Quality - Sediment/Turbidity	The DEIR must also identify and analyze any possible indirect and cumulative impacts to Ridgway's Rail tidal marsh habitat on the outboard side of the levee, including but not limited to the impacts of decreased sediment load and erosion and scour of the existing marsh resulting from wave deflection off the barrier.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Ridgway's Rail	The Project will likely trigger formal consultation with the U.S. Fish and Wildlife Service under Section 7 of the Endangered Species Act because of these potential impacts.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Shorebirds; Biological Resources - Habitat	The DEIR must document the current use of this area by shorebirds and analyze adverse impacts to the mudflat habitat from the construction of the proposed offshore barrier, and the conversion of mudflat habitat subject to natural, daily tidal cycles to a damped and artificially managed muted tidal lagoon, and eventually to a lagoon that no longer experiences natural tidal flows.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits

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Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Shorebirds; Biological Resources - Habitat; Recreation - Offshore Trail	The [DEIR] analysis must include project impacts to the mudflat, both inboard and outboard of the barrier, from barrier construction activities, and both physical changes (i.e., water depth, length of time mudflats are exposed, loss of mudflat habitat, etc.) and biological changes (i.e., shorebird prey abundance and species composition) from lagoon water management practices. How would variable conditions in the lagoon in the future impact aquatic invertebrates? How would human disturbance from a possible trail on top of the offshore barrier affect the birds?	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Recreation, Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Habitat	The DEIR must identify and analyze cumulative loss of mudflat habitat.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Birds	What impacts would the Project have on other water-dependent birds such as grebes, dabbling ducks, diving ducks, terns, egrets, herons, Black Skimmers, pelicans, cormorants, Sora, Virginia Rail and Osprey that have been documented (ebird.org) at the site?	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Fish; Hydrology and Water Quality - Algal Blooms/Eutrophication; Hydrology and Water Quality - Salinity; Hydrology and Water Quality - Sediment/Turbidity	Within the proposed lagoon, impacts to water quality from changes in suspended sediment, salinity due to extended freshwater flooding from creeks during rain events, water temperature within the lagoon, prey abundance due to potential eutrophication, harmful algal blooms and water depth, can all affect the fish utilizing the lagoon and each of these factors needs to be analyzed and mitigation proposed. Measures to avoid these impacts must be provided.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Fish; Biological Resources - Wildlife Migration and Movement	Fish can become trapped in the lagoon and exposed to low water levels and deteriorating water quality when the tide gates are closed on the proposed offshore barrier.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Fish; Pumping	Additionally, the pump station(s) associated with the offshore barrier could entrap fish. The DEIR must identify if this is an impact and if so, how it will be mitigated.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 30/60% Design, EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Marine Mammals	The Project BIO Report documents that both harbor seals and sea lions are in the Project area, and both species have haul outs at nearby Coyote Point. The DEIR must determine whether the barrier will essentially wall-off this foraging site. If they are able to gain access through a tide gate, are these marine mammals at risk of being injured from the gate or trapped inside the lagoon? As sea levels rise, and the tide gates are closed more frequently and for longer durations, this could be a possibility.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Marine Mammals	[Re: harbor seals and sea lions] Would the offshore barrier create habitat changes outboard of the structure that would impact the animals directly or through a decrease in prey species? The DEIR must identify and analyze all potential adverse impacts and provide measures to avoid or mitigate any harm to marine mammals.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Marine Mammals	The DEIR must evaluate the potential adverse impacts on marine mammals from human disturbance if a trail is placed on the offshore barrier, and propose effective mitigation measures.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Bird Strikes	The Project would create an offshore barrier and a lagoon and both could potentially create an increased risk of bird-strike hazards at San Francisco International Airport (SFO) and jeopardize public safety. The ALT Report (page 2-5) states: "...the proximity to runways also constrains the Project's ability to encourage the use of nature-based solutions and habitat enhancement. Depending on the type of habitat, "nature-based solutions and habitat enhancement" may not be more of an attraction to birds than an offshore barrier structure and a lagoon. The barrier structure would be located much closer to airport runways than any shoreline features and would introduce surfaces for birds to perch where there are none currently. The structure would most likely be an attractant for gulls, cormorants and pelicans. The lagoon could change habitat conditions in areas closer to the airport runways, leading to less exposed mudflat and more shallow, calm water. These changes could make the lagoon area less attractive to smaller shorebirds, and more attractive to larger waterbirds like ducks, geese, grebes, egrets and herons. The DEIR must identify and analyze possible impacts from the barrier structure and lagoon creating hazardous wildlife attractants for waterbirds, and determine if constructing these Project elements would violate FAA safety guidelines. The DEIR must: Describe how Bay wetland habitats would be enhanced within the lagoon. What are the restoration targets, how will monitoring be done, and what applied studies will be used in the decision-making process? Describe any habitat conversion that may occur as a result of implementing this project, including acreages of existing habitat that may be lost. The DEIR should also analyze the cumulative impacts of the proposed project on the loss of tidal marsh and mudflats.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Biological Resources - Habitat	The DEIR must: Describe how Bay wetland habitats would be enhanced within the lagoon. What are the restoration targets, how will monitoring be done, and what applied studies will be used in the decision-making process? Describe any habitat conversion that may occur as a result of implementing this project, including acreages of existing habitat that may be lost. The DEIR should also analyze the cumulative impacts of the proposed project on the loss of tidal marsh and mudflats.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Proven Examples	Identify offshore barrier/lagoon projects that have developed best management practices to achieve these goals. Describe how the tide gates/pumps will be operated with respect to tide levels and creek runoff.	Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Monitoring and O&M	Identify how the lagoon will be managed into the future to achieve the flood protection and habitat enhancement goals as sea level rises and rainfall patterns change due to climate change.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR, Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Report Error	Please note: the ALT Report states that the offshore barrier tide gates would be closed, "...about once every year or so during a king tide." (page 4-31). That is incorrect; king tides occur several times each year.	Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan)

Commentor	Commentor Affiliation	Topic	Comment	As of June 2024, when does OneShoreline currently expect this comment to be addressed? (Pre-EIR, EIR, 30/60% Design, Permits)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Process - Stable Project Description; Construction Methods	The DEIR must provide a clear, stable and complete description of the Project: including the number and location of tide gates, the number and location of pump stations, total extent of the barrier imprint on the floor of the Bay, construction methods and anticipated schedule of construction, and total height of the barrier above the Bay mud at low tide.	Pre-EIR (Updated Alternatives Feasibility Analysis), 60% Design, EIR
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Process - Stable Project Description	The DEIR should describe how the tide gates and pump stations would operate.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Process - Stable Project Description	The DEIR should describe how frequently the interior portions of the lagoon will be subject to daily tidal fluctuations both initially and as sea levels continue to rise.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Alternatives Analysis; Cost/Economic Impacts	Information should be provided regarding the anticipated ongoing costs for operation and maintenance of tide gates and pump stations – both initially and in the future under various sea level scenarios. Additionally, information should be provided regarding the estimated life span of the tide gates and pump stations – how often will they need to be replaced? These costs should be identified, including energy costs, as this information speaks to the financial sustainability of the proposed project.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Geology and Soils	What are the “stiffer materials”? The DEIR must identify the actual depth of the foundations, and determine if the barrier will be subject to settlement issues.	Pre-EIR (LEDPA), EIR (Geology and Soils)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Geology and Soils; Hydrology and Water Quality - Sediment/Turbidity	The southern section of the barrier would be built in an erosional environment (COA Report Figure 4-9). What kind of lateral pressure would be put on the barrier if sediment outboard is being depleted while sediment accumulates inboard of the barrier?	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Geology and Soils, Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Geology and Soils; Hydrology and Water Quality - Sediment/Turbidity	How deep would the barrier need to be installed to ensure the structure will not be compromised by erosion at the toe of the barrier, and how will the structure be tied in the area of heavy erosion?	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Geology and Soils, Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Risk of Project Failure	If the offshore barrier were to experience a catastrophic failure, what would be the impacts, initially, and with higher sea levels?	Pre-EIR (Updated Alternatives Feasibility Analysis)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Geology and Soils - Seismic Resilience	An analysis of how the barrier is anticipated to function under different magnitude seismic events must be provided in the DEIR.	EIR (Geology and Soils)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Equity/Environmental Justice	The DEIR needs to evaluate potential impacts of the offshore barrier on neighboring communities, including those disadvantaged, along the Bay shoreline and nearby natural shorelines and wetlands.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), NEPA (Environmental Justice)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Hydrology and Water Quality - Coastal Hazards	Converging shorelines increase tidal amplitude towards the landward end of enclosed estuaries. In the advent the new offshore barrier creates converging shorelines, the impacts must be evaluated in the DEIR.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Hydrology and Water Quality - Coastal Hazards	Impacts from the offshore barrier reflecting waves onto existing outboard wetland and mudflat habitats and SFO flood control structures must be analyzed in the DEIR.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Process - Land Rights	The DEIR must identify the location and property owner for all parcels where the offshore barrier would be located and anchored, and parcels within the lagoon. Any impacts on the feasibility of the Project due to over-riding concerns of landowners should be analyzed.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Recreation - Fishing	Without a trail providing access to the “new Bay shoreline”, an offshore barrier would eliminate existing Bay shoreline public fishing areas and replace it with a lagoon...How will the Project provide for comparable ADA compliant access for anglers with mobility limitations? How would the species of fish change in the lagoon, and will the fish people desire still be available and in the same size range? The lagoon may concentrate toxins and pollutants – what impacts could this have on the health of people consuming the fish? Answers to these questions should be provided in the DEIR.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation), 60% Design
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Recreation - Fishing; Equity/Environmental Justice	A 2020 study by the San Francisco Estuary Institute found that, “Shore-based anglers tended to be non-Caucasian, whereas boat anglers were predominately Caucasian. Asians were the largest group fishing from piers and beach and bank sites, with Filipinos comprising the largest Asian group. A higher proportion of shore-based anglers reported household incomes less than \$20,000/year...” The DEIR must evaluate the impacts of the potential loss of shore-based fishing opportunities on members of the community, including underrepresented groups, currently utilizing public fishing areas.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), EIR (Recreation), NEPA (Environmental Justice), 60% Design
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Recreation - Windsports	How would an offshore barrier impact members of the public engaged in water sports? The DEIR must identify and analyze potential impacts to currents and waves outside the barrier, changes in conditions within the lagoon, and any changes to public access points	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Hazards and Hazardous Materials; Recreation; Hydrology & Water Quality	There may be periods of degraded water quality within the lagoon – what impacts would this have on the health of people exposed to the water? The CEQA process for the Project should include outreach to community members involved in water sports for input on the Project.	EIR (Hazards and Hazardous Materials)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Hydrology & Water Quality; Biological Resources - Habitat	Impacts to the New SPHERE Institute Shoreline Park: The new nature park will be within the lagoon. What impact will the Project lagoon have on the hydrology and vegetation of this new tidal marsh?	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits

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Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Report Error	The Project Biological Resources Constraints Analysis does not mention that the Project area is designated as an "Important Shorebird Site" by the Western Hemisphere Shorebird Reserve Network (https://experience.arcgis.com/experience/bb389a6c909145269f3bb1c52992eefc). Given the importance of mudflat habitat to wildlife, including fish, birds and marine mammals, why didn't the BIO Report include detailed information on the extent and importance of this habitat within the Project area? This significant oversight must be corrected in the DEIR.	Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Report Error	According to the BIO Report, two field surveys were made in July 2022 to document actual conditions in the Project area. The survey only covered areas within the shoreline and creek barriers alternative and did not include observations in the areas of the offshore barrier/lagoon alternative, which is the Preferred Project Alternative. Appropriate surveys should have been conducted for all alternatives under consideration for the NOP, including the areas that will be outboard of the proposed barrier. The survey was made in the summer, when the majority of Bay waterbirds are on their breeding grounds elsewhere.	Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Report Error	Page 49 of the BIO Report states that, "Nearshore sandy bottom marine habitat is found throughout the study areas for all alternatives. This habitat consists mainly of sands, mud, and sedimentary particles in locations of lower water movement.", Figures 12 – 17 show a continuous line of "Near-shore sandy Bottom" depicted in the project site, and Figures 18-21 appear to show extensive "Near-shore sandy Bottom" in the entire project area. The San Francisco Bay Subtidal Habitat Goals Project Interactive Soft Substrate Habitat Distribution Map indicates that this entire project area is mudflat habitat. (https://sfbaysubtidal.org/map_portal/softsubhabitat.html), and CCCR observations along the shoreline did not reveal a line of sandy substrate. Please clarify, and ensure that the characterization of the substrate in the Project area is accurate in the DEIR.	Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Report Error	On page 48, the BIO Report characterizes the salt marsh vegetation in the project area as Northern Coastal Salt Marsh and specifically documents the presence of California cordgrass, and in both areas of tidal marsh in the Project area, California cordgrass appears to be the dominant plant. The California Department of Fish and Wildlife "Sensitive Natural Communities" lists <i>Spartina foliosa</i> "California Cordgrass Marsh" as G3/S3 and the <i>Spartina foliosa</i> – <i>Sarcocornia</i> Alliance is considered "Sensitive". (file:///C:/Users/mtled/Downloads/3_CaliforniaSensitiveNaturalCommunities_20230601.pdf). Based on the site description on page 48, the Special Status Species Evaluation Table for Plant and Lichen species (Appendix B, pages B1 – B9) should include cordgrass (<i>Spartina foliosa</i>) and the cordgrass-pickleweed (<i>Spartina foliosa</i> – <i>Sarcocornia</i>) Alliance so that impacts to that sensitive community will be analyzed in the DEIR.	Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Process - Outreach	It is perplexing, as illuminated in the Joint Letter submitted by environmental groups on November 30, 2023, that the NOP identifying the offshore, in-Bay barrier as the preferred alternative, was issued prior to consulting with key stakeholders such as the City Council of Millbrae, and the San Francisco International Airport (SFO). It is frustrating, that in failing to consult with key stakeholders, regulatory and resource agencies and landowners, there are significant issues that cannot be over-ridden and should have been considered in the selection of the preferred alternative – for example, issues of public safety as described by SFO during the November 2, 2023 Public Scoping meeting.	Pre-EIR (Outreach Plan)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Process - Stable Project Description	It is imperative, that should this project continue to the preparation of a DEIR, that across the many reports that will be created, there is a consistent description of the project that is clearly stated, stable (meaning key features are consistently identified and analyzed across the gamut of documents) and with sufficient details to enable the decision-makers and the public to provide substantive comments. As an example of the lack of consistency, the biological constraints document mentions six tide gates installed within the barrier, as opposed to the feasibility report that for modeling purposes used a number of 80 tide gates. It is impossible to assess what potential impacts to the environment might arise when given such a huge variation in something as crucial to the proposed project as tide gates.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Process - Request to Reissue NOP/Reconsider Preferred Alternative	We urge the OneShoreline Board of Directors to withdraw the current NOP and consult with key stakeholders prior to continuing with this environmental review process. It is better to spend the effort upfront, than to find at the end of several years of design and review expenditures, that the project is not permittable...We request that we be informed of the OneShoreline Board of Director response to the suggestion that the NOP be withdrawn until key stakeholders have been consulted.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA)
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Hydrology and Water Quality	Failing withdrawal of the NOP, we urge the OneShoreline Board of Directors to consider assembling a strong multi-disciplinary consultant team qualified to address complex water quality and ecosystem-level effects of the proposed tidal lagoon impoundment and damping of the tidal flows of the Bay.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Citizens Committee to Complete the Refuge (CCCR)	Environmental Organization	Process - Outreach	We also request that we be notified of future opportunities for public review and comment on shoreline protection for this segment of the Bay.	Pre-EIR (Outreach Plan)
City and County of San Francisco, Office of the City Attorney	Property Owner	Process - Land Rights	As OneShoreline is aware, a significant portion of the proposed Project area within the San Francisco Bay (Bay) is located on land owned by the City and is part of SFO. In fact, the City owns a significant amount of land within the Bay surrounding the Airport. OneShoreline does not currently have any legal authority to construct, operate and maintain the Project on City land and the City would not grant such authority for the Project as currently proposed because this land use is incompatible with Airport operations...	Pre-EIR (Updated Alternatives Feasibility Analysis)

Commentor	Commentor Affiliation	Topic	Comment	As of June 2024, when does OneShoreline currently expect this comment to be addressed? (Pre-EIR, EIR, 30/60% Design, Permits)
City and County of San Francisco, Office of the City Attorney	Property Owner	Land Use and Planning - Permits and Approvals	The area is located within the Airport's 65 and 70 dB CNEL noise contours and a small portion is located in Airport Safety Compatibility Zone 5 (Sideline Zone).	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Land Use and Planning), Permits
City and County of San Francisco, Office of the City Attorney	Property Owner	Biological Resources - Bird Strikes	The installation of a structure with habitat features would likely create a hazardous wildlife attractant that could interfere with approaches to the nearby 28L and 28R runways. For airports serving turbine-powered aircraft, the Federal Aviation Administration recommends a separation distance from the airport of 10,000 for certain hazardous wildlife attractants (e.g., parks, landscaping) and this barrier would be much closer than that.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources)
City and County of San Francisco, Office of the City Attorney	Property Owner	Biological Resources - Bird Strikes; Land Use and Planning - Permits and Approvals	The creation of new habitat features would be inconsistent with Airspace Protection Policy AP-4 of the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (SFO ALUCP), which states that "[p]roposed land uses with characteristics that may cause visual, electronic, or wildlife hazards, particularly bird strike hazards, to aircraft taking off or landing at the Airport are incompatible" in the area where the Project is proposed (SFO's Airport Influence Area B).	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Land Use and Planning), Permits
City and County of San Francisco, Office of the City Attorney	Property Owner	Land Use and Planning - Permits and Approvals	Depending on the barrier's height, it could penetrate the Part 77 critical aeronautical surfaces for the Airport in the vicinity of Runway 1R/19L.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Land Use and Planning), Permits
City and County of San Francisco, Office of the City Attorney	Property Owner	Process - Land Rights; Process - Outreach	The City requests that OneShoreline immediately remove from the Project the po1ion located on City land or confer with Airport staff to determine whether the Project can be modified to address its concerns as the City will not grant OneShoreline permission to construct the Project on its land as currently proposed. If OneShoreline fails to remove City land from the Project or make modifications to address the Airport's concerns, the City reserves the right to pursue all rights and remedies available under the law to prohibit OneShoreline from constructing the Project on City land.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis)
City of Millbrae	City	Tie-In Location - Millbrae; Hydrology and Water Quality - Sediment/Turbidity; Hydrology and Water Quality - Local Drainage	The location of the offshore barrier will be critical to operation and flow of the Lomita Canal, Highland Canal, and El Portal Canal, which flow into the San Francisco Bay. The proposed offshore barrier could affect how sediment is transported into the Bay, the upstream hydraulics of the system, and the water quality. How will the water quality be maintained within the area of the proposed barrier? We ask that these items be carefully studied and that the hydraulics and water quality are maintained.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), 30/60% Design, EIR (Hydrology and Water Quality), Permits
City of Millbrae	City	Biological Resources - Habitat; Aesthetics - Viewshed; Recreation	The location of the offshore barrier would affect existing habitat, views, and any recreational activities.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Aesthetics), Permits
City of Millbrae	City	Tie-In Location - SFO	Has this project been analyzed to connect the offshore barrier to the beginning of runways 28L/R?	30% Design, Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), 60% Design
City of Millbrae	City	Noise	Regarding noise impacts, the project should analyze the current conditions, which may include existing issues/problems	EIR (Noise), Permits
City of Millbrae	City	Hydrology and Water Quality - Local Drainage	As the offshore barriers may affect the flow and operations of the canals, the project should analyze the hydraulics and hydrology of areas upstream of the project. More specifically, the Landing Lane and San Anselmo A venue neighborhood should be studied, as they are located in the area affected by the project.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
City of Millbrae	City	Hydrology and Water Quality - Removal of FEMA Floodplain	The City is embarking on the Eastside Specific Plan and will rely on documents prepared for this project's EIR. The City would be incorporating any of the findings into the Eastside Specific Plan. Much of the Eastside Specific Plan area is in a flood zone and this project has modeled the hydraulics, showing it would remove many of the Millbrae properties out of the floodplain. This would be great news for those properties; however, have the results of the initial model been reviewed and approved by FEMA?	Pre-EIR (LEDPA), EIR (Hydrology and Water Quality)
City of Millbrae	City	Recreation; Aesthetics	The design of shared non-motorized pathway and shoreline features are accurately evaluated.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Aesthetics), Permits
City of Millbrae	City	Nature-Based Solutions	Bayfront improvements would incorporate aspects of "green infrastructure."	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), Permits
City of Millbrae	City	Cost/Economic Impacts	Maintenance efforts and cost of improvements are identified and how said cost could be funded.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design
City of Millbrae	City	Process - Outreach	During the EIR process, it will be important to have a robust community engagement/public input program for residents to provide any insight in which the project could improve current conditions.	Pre-EIR (Outreach Plan)
Danielle Weerth	Individual	Nature-Based Solutions	Using nature-based design elements significantly increases species settlement, richness, and abundance. Nature-based design elements and nature-based solutions allow a structure to actively provide carbon sequestration, decrease the magnitude and frequency of maintenance leading to increased structural lifespan.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), Permits
Danielle Weerth	Individual	Construction Methods; Nature-Based Solutions	Using ecological concrete as a mitigation measure and design alternative supports compliance with strict environmental regulations. The term "ecological concrete" is an alternative to traditional concrete where material composition enhances or encourages the growth of flora or fauna when placed in the marine environment. Ecological concrete may include recycled materials, such as recycled or reclaimed concrete, resulting in reduced greenhouse gas emissions as compared to traditional concrete.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR, Permits
Danielle Weerth	Individual	Construction Methods; Nature-Based Solutions	...all concrete materials should solely be fabricated from ecological concrete in order to minimize negative impacts and create marine habitat opportunities in the Millbrae and Burlingame Shoreline Area Protection and Enhancement Project.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR, Permits

Commentor	Commentor Affiliation	Topic	Comment	As of June 2024, when does OneShoreline currently expect this comment to be addressed? (Pre-EIR, EIR, 30/60% Design, Permits)
Erin Lennane	Individual	Tie-In Location - Coyote Point; Recreation - Windsports	The levee, as proposed, will section off as significant area from recreational use which has been in place since the 60s. We recommend a modification, i.e. moving the barrier closer to shore, and NOT linking it across the area from the point to the higher elevation at coyote point park. It must not impede windsports activities in the local area.	30% Design, Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), 60% Design, EIR (Recreation)
Erin Lennane	Individual	Alternatives Analysis - New Alternative	A suggested alternative to sectioning off San Francisco Bay would be to build up a barrier marked in red.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Erin Lennane	Individual	Alternatives Analysis - Support for Onshore Alternative	Alternatively, I don't think enough thought has been put into building a levee underneath the existing bike path. An elevation of several feet would matter little to the businesses and recreational users. This, again, would achieve similar results as building a barrier in the bay with gates. The feasibility of such an elevation should be reevaluated.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Eugenia McCauley	Individual	Tie-In Location - Coyote Point; Recreation - Windsports	I am one of the many windsport enthusiasts who use Coyote Point Recreation Area regularly for its world-class windsports conditions, and this proposal (particularly if it extends down in front of the beach of Coyote Point Recreation Area) has an exceedingly detrimental effect on our bay access and recreation. It would essentially prevent the access of the bay for windsports.	30% Design, Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), 60% Design, EIR (Recreation)
Eugenia McCauley	Individual	Recreation	It would also likely alter the bay floor which would make for a far less enjoyable use of the bay by swimmers/waders/beach goers at the beach/swimming area of Coyote Point Recreation Area.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation), 60% Design
Eugenia McCauley	Individual	Recreation - Windsports	I would hope this project would allow for the continued use of the bay for windsports from the Coyote Point Recreation Area, or to include a proposal for an alternate bay access for windsports.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation)
Federal Aviation Administration, Western Pacific Region	Agency	Biological Resources - Bird Strikes	Due to the proximity of the proposed project to SFO, the FAA recommends that OneShoreline utilize the guidance provided in Advisory Circular (AC) 150/5200-33C, Hazardous Wildlife Attractants on or near Airports, enclosed, to ensure that project elements do not introduce wildlife hazards to the aviation operations in the area.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources)
Federal Aviation Administration, Western Pacific Region	Agency	Process - Outreach; Biological Resources - Bird Strikes	Given the close proximity to airport runways and flight paths, the FAA advises that OneShoreline coordinate with any modifications to the Bay and shoreline with SFO to avoid and/or minimize the introduction of any potential wildlife attractants.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources)
Federal Aviation Administration, Western Pacific Region	Agency	Recreation - Offshore Trail; Airport Security	FAA notes that the proposed project could include a pedestrian trail situated on the tidal lagoon barrier, of which the western endpoint connects directly to airport property and would be directly adjacent to Runway 1R. Due to close-in proximity, along with safety and security concerns, FAA does not concur with the inclusion of the subject pedestrian trail.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation)
Federal Aviation Administration, Western Pacific Region	Agency	Land Use and Planning - Permits and Approvals	Projects that have the potential to affect navigable airspace as defined in 14 Code of Federal Regulations Part 77.9 must file a Notice of Proposed Construction or alteration, Form 7460-1 with the FAA.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Land Use and Planning), Permits
Federal Aviation Administration, Western Pacific Region	Agency	Land Use and Planning - Permits and Approvals; Process - Outreach	The Airport Sponsor would be required to submit an updated Airport Layout Plan (ALP) to depict the proposed project. The updated ALP would be coordinated with the various FAA lines of business for comment and approval. Further, the Sponsor would need to submit a Section 163 review request to evaluate and determine FAA ALP approval authority and FAA's authority to regulate airport land. These are in addition to the Federal permits and approvals identified in Section 3.5.1 of the Conceptual Alternatives Feasibility Analysis.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), EIR (Land Use and Planning), Permits
Jeffrey Finn	Individual	Nature-Based Solutions	I would not be in favor of Hard armoring as depicted with a long Dike, but some Soft Armoring. Soft Armoring involves the creation or restoration of a natural shoreline system using nature-based shoreline management techniques. Living Shorelines mimic natural functions to provide erosion control, but unlike their hard-armored counterparts, also improve water quality, enhance shoreline habitat, & help maintain natural coastal processes.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), Permits
Jeffrey Finn	Individual	Recreation - Windsports	Many of our Windsurfers, Winger foilers and Kite-boarders are interested in windsurfing after work in areas close to their work sites. In fact, many of our members (including yours truly) have chosen specific locations within the Bay Area as their home and workplace specifically for the world-class windsurfing and kite-boarding sites and opportunities, and a good number have chosen professions and employers based upon the ability to windsurf and kite-board in the mid-to-late afternoons when the wind is at its strongest...your plans would if implemented would prohibit any recreational water uses and access.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation)
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Lack of Detail in NOP	We applaud OneShoreline for coordinating multi-jurisdictional efforts to plan and implement measures to build resilience to climate change; however, the release of this NOP is premature.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Outreach; Process - Request to Reissue NOP/Reconsider Preferred Alternative	...There has been a lack of transparency and outreach to agencies, key stakeholders and the public with respect to the process for identifying the Preferred Project Alternative that has been selected for further detailed studies in the EIR. For these reasons, we strongly urge you to rescind the current NOP and reissue it only after ensuring regulatory and resource agencies, key stakeholders and the community have the opportunity to provide critical input, informing the decision on alternatives that should be considered and the selection of the Preferred Project Alternative for further CEQA analysis.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA)

Commentor	Commentor Affiliation	Topic	Comment	As of June 2024, when does OneShoreline currently expect this comment to be addressed? (Pre-EIR, EIR, 30/60% Design, Permits)
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Insufficient Alternatives Analysis; Process - Outreach	According to the January 2022 Request for Proposals (RFP) that OneShoreline issued for this project, prior to preparation of the NOP, the final decision criteria for the alternatives analysis and selection were supposed to be "based on input from the project key partners and stakeholders". In spite of a clearly defined process, the outreach to secure input on this decision never occurred, or only occurred on a limited basis, and OneShoreline appears to have made the decision on the Preferred Project Alternative in a "key stakeholder vacuum".	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), EIR
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Outreach	No presentation on the "Project" described in the NOP (the offshore barrier and lagoon) was made to the City Councils of Millbrae or Burlingame prior to the NOP release.	Pre-EIR (Outreach Plan)
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Outreach	SFO, an adjacent jurisdiction and key stakeholder, was also caught off guard when the NOP was released.	Pre-EIR (Outreach Plan)
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Outreach	Based on testimony at the public meeting, there also appears to have been no outreach to local recreational kiteboarders, or environmental groups about the preferred project alternative prior to release of the NOP.	Pre-EIR (Outreach Plan)
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality - Algal Blooms/Eutrophication	The Bay is facing an increasing threat from Harmful Algal Blooms (HABs) in areas of calm, shallow and warmer waters, and the Offshore Barrier and Lagoon alternative may replicate such conditions, potentially leading to periodic die-offs of fish, sharks and rays, as well as potential harm to humans. The proposed project would initially mute tidal flushing in this area, and eventually, with sea level rise, create increasingly less tidal circulation in the artificial lagoon just as conditions conducive to HABs, such as higher temperatures and prolonged heat waves, become more prevalent.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality; Biological Resources	In addition to muted tidal circulation...The detention of the freshwater flows from the five creeks will likely have significant and adverse impacts to water quality within the lagoon that could harm fish, invertebrates and aquatic and marsh vegetation, including changes in salinity, water temperature, turbidity and dissolved oxygen, and impacts from volatile sulfides, nitrogen, sediment and toxins.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Hydrology and Water Quality), Permits
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Biological Resources - Ridgway's Rail	In addition, these impacts could adversely affect species higher up the food chain, particularly for species currently identified within the Project area such as the endangered Ridgway's Rail.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality - Sediment/Turbidity; Monitoring and O&M	There may also be a need for future dredging from accumulated sediment	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR (Hydrology and Water Quality), Permits
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality - Algal Blooms/Eutrophication	The report fails to identify the coarse organic debris loading from the creeks and flood control channels, or debris that initially floats and then sinks to the bed, which in turn provides the carbon fuel for microbial decay and anoxia that drives toxic hydrogen sulfide and oxygen deficits, fish kills, phosphorus and ammonia release from the detention basin bed sediments, and creates favorable conditions for the development of HABs.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits

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Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality - Under Multiple Scenarios	As sea levels continue to rise, what happens to the tidal flow in the lagoon?	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Land Use and Planning - Permits and Approvals	This unprecedented project proposal faces significant regulatory challenges to secure the approval of the federal, state and regional agencies with jurisdiction over the Bay waters and the subtidal, intertidal and wetland habitats and endangered species found in the immediate Project area.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Land Use and Planning), Permits
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Biological Resources - Bird Strikes	In addition, the proximity of both the offshore barrier and the lagoon to SFO raises public safety concerns related to bird strike hazards that may not be able to be resolved.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources)
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Land Use and Planning - Permits and Approvals	Each alternative considered for this project should be vetted with the permitting and resource agencies to ensure it is in fact feasible under state and federal regulations and policies, before moving on for further detailed analysis in the EIR. This is even more critical for a substantial offshore barrier/artificial lagoon project that is unprecedented in San Francisco Bay.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Land Use and Planning), Permits
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Land Use and Planning - Permits and Approvals; Process - Insufficient Alternatives Analysis; Process - Outreach	Both agencies have already indicated a strong preference for a shoreline barrier to the construction of an offshore, in-Bay barrier. Both agencies have also indicated that permitting the preferred alternative would be “challenging.” Given this initial feedback, it is puzzling that OneShoreline has chosen to disregard this feedback.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), EIR (Land Use and Planning), Permits
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Alternatives Analysis - Support for Onshore Alternative	The NOP states that a flood protection alternative “exclusively with features along the shoreline” will also be evaluated in the EIR, and OneShoreline has deemed the Shoreline Barrier and Tide Gates alternative to be feasible. Clearly, alternatives exist to placing an offshore barrier inside Bay waters to address the challenges of coastal creek flooding and sea level rise.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Alternatives Analysis	It is true that the federal environmental review process is generally not triggered until a CWA permit application is submitted; however, it would be irresponsible to wait until that late in the game to determine whether the preferred alternative is in fact the LEDPA.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Process; Cost/Economic Impacts	Against this dire backdrop of a regional funding shortfall, it is not prudent to expend precious funding, time and resources to continue with the costly development of an engineering design and environmental analysis for a project proposal that has not been adequately vetted with major stakeholders, may have significant air traffic safety concerns, and may not receive the necessary regulatory permits. Grant funding, OneShoreline staff resources and permitting agency time could be redirected to analysis of a project that doesn’t have unprecedented and potentially severe impacts to San Francisco Bay waters, habitats and wildlife, or public safety.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Regional Precedent	With funds from this measure, barriers constructed atop former marshlands at the edges of the Bay are now being breached to re-establish tidal flows and ensure the ecological health of the estuary, and to provide sea level rise resilience for our communities. This project represents a significant departure from decades of efforts to remedy past harms to San Francisco Bay. OneShoreline should reconsider promoting a project that walls off a significant portion of the Bay through construction of an offshore barrier/floodwater detention lagoon, sets a dangerous regional precedent, jeopardizes the health of the estuary, may pose significant risks for air traffic safety, and disregards the Bay Area community’s closely-held conservation values.	Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan)

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Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Outreach	As a public agency, OneShoreline has an obligation to follow its defined protocol of outreach to the public and key stakeholders and to conduct deliberations and decision-making on multi-jurisdictional projects in a transparent, inclusive, and effective manner. Again, we urge OneShoreline to halt the CEQA process until you solicit, and consider, input from key stakeholders, the community and permitting agencies on the selection of the Preferred Project Alternative.	Pre-EIR (Outreach Plan)
Joint Letter: Citizens Committee to Complete the Refuge, Center for Biological Diversity, Sequoia Audubon Society, Green Foothills, San Francisco Baykeeper, and Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Outreach	We request that we be kept informed of any decision regarding whether OneShoreline will continue with, or will withdraw, the current NOP, as well as any future opportunities for public review and comment on the proposed project.	Pre-EIR (Outreach Plan)
Karl Hoffman	Individual	Recreation - Windsports	As a user/watersports enthusiast who regularly uses Coyote Point, the proposed sea wall will damage the watersports usage at Coyote Point in its current form...I realize the threat of tides and floods, and protection needs to be built - but it needs to be done in such a way as to allow continued access to this amazing location.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation)
Ken Poulton	Individual	Existing Conditions	Coyote Point is the second most popular site for wind sports in the South Bay, in use since the 1980's. Its wide sand beach makes it the only beginner-friendly launch in the South Bay. Relatively deep water makes it the only consistently usable launch in the South Bay. Beaches and amenities for swimming and beach use were rebuilt in 2020-2022, with high use in summer months.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Project Setting)
Ken Poulton	Individual	Aesthetics - Viewshed	An 18' levee would destroy the scenic view of the Bay from the ~12' Bay Trail.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Aesthetics), Permits
Ken Poulton	Individual	Recreation; Hydrology and Water Quality - Sediment/Turbidity	The area inside the levee would silt up rapidly, soon becoming too shallow for swimmers and wind sports.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Ken Poulton	Individual	Recreation - Windsports	The area inside the levee is too small for wind sports and has bad wind due to Meta buildings.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation)
Ken Poulton	Individual	Recreation - Windsports	Getting to the levee would require walking 1000 feet through mud. Getting over a riprap levee would be hazardous, and extremely hazardous for kitesurfers.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation)
Ken Poulton	Individual	Recreation; Hazards and Hazardous Materials	Anyone injured on the levee would be difficult to reach.	EIR (Hazards and Hazardous Materials)
Ken Poulton	Individual	Hydrology and Water Quality - Sediment/Turbidity	Lagoon areas will quickly fill with silt. A salt pond with levee openings at the Dumbarton Bridge has silted in from low-tide level to near the high-tide level in just 13 years. The result is that offshore levees amount to new Bay fill.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Ken Poulton	Individual	Proven Examples	Are the proposed tide gates realistic? Existing reports provide no examples of the proposed tide gates. Relying on multiple gates to open and close daily in a salt water environment may put tidal protection at risk.	Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan)
Ken Poulton	Individual	Hazards and Hazardous Materials; Recreation	Any offshore levee at Coyote Point must be specially designed to preserve access and safety. It's not clear this is feasible.	EIR (Hazards and Hazardous Materials)
Ken Poulton	Individual	Alternatives Analysis - New Alternative	Onshore Alternatives for Coyote Point - CP1: Raise the Coyote Point Promenade to 18'; CP2: Build a 6' inland levee	Pre-EIR (Updated Alternatives Feasibility Analysis)
Kirk Lindstrom	Individual	Tie-In Location - Coyote Point; Recreation - Windsports	After watching your presentation and listening to comments by others, my fear is your "option three" to build a massive structure with tide gates well off the current shoreline will destroy access to the Bay and further degrade wind quality at my favorite windsurfing site, Coyote Point Recreation Area. Sadly, there are no "reasonable alternatives" to Coyote Point (with deep enough water and sufficient parking for most tides) anywhere else on this side of the Bay except for Crissy Field, which is too far for me in traffic.	30% Design, Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), 60% Design, EIR (Recreation)
Kirk Lindstrom	Individual	Alternatives Analysis - Support for Onshore Alternative	I urge you to reconsider option #2 which doesn't cause more of the SF Bay to be lost forever and seems to match work that other cities in San Mateo County have done such as the just completed project in Foster City.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Kirk Lindstrom	Individual	Land Use and Planning	I would also consider new option #4 which is to use the funds for this project to buy properties that would be affected by rising sea level. Perhaps demolish the buildings and use the land to build a healthy, natural shoreline restoration solution that benefits people and wildlife.	EIR (Land Use and Planning)
Mark Moulton	Individual	Risk of Project Failure	Additionally, my comments on the project EIR are that the proposed projects are bound to fail. The proposed "solutions" kick the can down the road and are a moral hazard, transferring risk that is preventable. Such actions as the Millbrae and Burlingame Area Protection will not last as solutions for the lifetimes of our grandchildren.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Mike Capuano	Individual	Existing Conditions	Coyote Point has just recently been completely upgraded for the public to enjoy the beach with its beautiful views with tens of thousands of visitors per year to enjoy trails, the beach, views and windsports. In fact, Coyote Point is probably the best and safest Wingfoiling and Windsurfing spot in the Bay Area and one of the best spots in the world, for that matter.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Project Setting)
Mike Capuano	Individual	Tie-In Location - Coyote Point; Recreation - Windsports	I definitely do not support it with a "tie-in" to Coyote Point as this dramatically impacts Coyote for nearly all visitors and effectively destroys Coyote for wind sports enthusiasts who have been using this site for over 30 years.	30% Design, Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), 60% Design, EIR (Recreation)

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Mike Capuano	Individual	Bay Fill	Even with no Coyote Point ðŸŒ‰ in, this is a massive amount of Bay fill.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), Permits
Mike Capuano	Individual	Alternatives Analysis - Support for Onshore Alternative	I would suggest you pursue option 2 or some other option.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Mike Capuano	Individual	Project Need	I do appreciate and support your goal of protecting homes and businesses in the areas of the Bay that were filled. While we all know this fill should not have happened and many of these homes and businesses should never have been built, they were indeed built and it has to be dealt with.	Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), EIR
Mike Capuano	Individual	Tie-In Location - Coyote Point; Recreation; Aesthetics - Viewshed	...It is critical to all of the recreational users of Coyote Point that you find a solution that does not block the view, ruin the water for swimmers/bathers and the access to the bay for hundreds of water sports enthusiasts from April to October.	30% Design, Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), 60% Design, EIR (Aesthetics), Permits
Mike Capuano	Individual	Recreation - Windsports	While a handful of wing foilers and windsurfers get into the water at 3rd Avenue, most of them launch from Coyote Point with its good winds, deeper water for foil-based sports and better car-to-water logistics for the heavier gear of wing foiling and wind surfing. This natural distribution helps balance out the parking congestion and the crowds on the water, increasing safety at both 3rd Ave and Coyote.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation)
Millbrae City Councilmember Ann Schneider	Individual/City	Process - Outreach	I have great concerns over the process used by OneShoreline due to lack of adequate communication with the people of Millbrae and it's elected officials who are responsible for the City of Millbrae. OneShoreline may have worked with Millbrae staff but did not hold any meetings for the people of Millbrae. I am the Millbrae City Council member responsible for relaying information about sea level rise issues, yet I am delegated to a 2-minute comment period at OneShoreline Board meetings on issues that directly impact my City and our residents. At no time did staff reach out to me to ask what we, Millbrae are planning for flood control, updating our Highline Canal and Lomita Creek systems, our outfall pipes and other critical infrastructure and how it may work with plans created by OneShoreline.	Pre-EIR (Outreach Plan)
Millbrae City Councilmember Ann Schneider	Individual/City	Process	I requested the Board of OneShoreline to review SFO's Shoreline Protection Plan EIR as it has huge implications to Millbrae, more so than any other community. Yet the staff of OneShoreline sent in a one-page letter saying that they look forward to working with SFO on sea level rise projects, even as those detrimentally impact the City of Millbrae.	Pre-EIR
Millbrae City Councilmember Ann Schneider	Individual/City	Process - Outreach	Now, without a single meeting with our public to both review the findings of studies OneShoreline has taken, without showing a range of sea level rise possibilities to the people of Millbrae, without first coming to Millbrae City Council to talk about alternatives, you simply show us a wall, not even knowing exactly where you might put this wall, and move forward on conducting environmental review of this project.	Pre-EIR (Outreach Plan)
Millbrae City Councilmember Ann Schneider	Individual/City	Process - Lack of Detail in NOP; Process - Stable Project Description	As to the alternative, it is simple a line on a map with no real description of what this alternative could do and look like. Without knowing exactly where this wall is going, how can you be honest in an EIR and honest as to its impacts? Without a more detailed explanation of how the alternative could be designed how can you conduct true and honest analysis of its environmental impacts.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Millbrae City Councilmember Ann Schneider	Individual/City	Process	Process is wrong. Start over with a real public process	Pre-EIR (Outreach Plan)
Millbrae City Councilmember Ann Schneider	Individual/City	Alternatives Analysis	Include all possible alternative plans, what they would entail, with drawings and diagrams of each example. Including plantings and elevations.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Millbrae City Councilmember Ann Schneider	Individual/City	Noise	Include noise impacts not just during construction but in conjunction with what SFO will be doing and Caltrans actions as this area is already greatly noise impacted. Be aware that under the current reauthorization of the Federal Aviation Administration, that they should be looking at new noise metrics, hopefully lowering the noise threshold for mitigation actions including low frequency noise from departures and reverse thrust on arrivals.	EIR (Noise), Permits
Millbrae City Councilmember Ann Schneider	Individual/City	Air Quality	How any engineering decision will disturb embedded carbon in marine soils causing large releases of carbon into the atmosphere (see recent study off Marine soil carbon sequestration off the California coast).	EIR (Air Quality)
Millbrae City Councilmember Ann Schneider	Individual/City	Equity/Environmental Justice; Recreation	Analyze recreational opportunities already lost to Millbrae by the creation and expansion of SFO from the 1920s onwards and how to use this project to restore access to the Bay for the people of Millbrae. We should have the same recreational opportunities as every other coastal community (as should San Bruno too).	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), NEPA (Environmental Justice)
Millbrae City Councilmember Ann Schneider	Individual/City	Hydrology and Water Quality - Local Drainage; Equity/Environmental Justice	Describe how the wall and alternatives will help solve long term flooding of Millbrae neighborhoods including Millbrae Ave., Westin/Aloft, Gateway at Millbrae Station, Millbrae Train Station, Bayside Manor, Marina Vista, Landing Lane / Airport Park neighborhood, Lomita Elementary School as well as flooding moving north from Millbrae and into San Bruno since SFO blocks both cities access to SF Bay and lost both cities our historical creeks to the bay.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), EIR (Hydrology and Water Quality), NEPA (Environmental Justice), Permits
Millbrae City Councilmember Ann Schneider	Individual/City	Local Drainage	Include how Caltrans plans to handle stormwater from 101 and that impact to Millbrae.	No action anticipated
Millbrae City Councilmember Ann Schneider	Individual/City	Recreation	Use this project to enhance the SF Bay Trail that runs along the Bay until Millbrae Ave.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation), 60% Design
Millbrae City Councilmember Ann Schneider	Individual/City	Hydrology and Water Quality - Local Drainage; Equity/Environmental Justice	Use this project to enhance drainage of Millbrae, to fix past wrongs done to the City by SFO, San Francisco and San Mateo County.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), EIR (Hydrology and Water Quality), NEPA (Environmental Justice), Permits
Millbrae City Councilmember Ann Schneider	Individual/City	Mitigations	Ensure that mitigation of this project and that of SFO is invested into improving Millbrae and San Bruno as all SFO mitigation efforts should and never have.	Pre-EIR, EIR, Permits
Millbrae City Councilmember Ann Schneider	Individual/City	Mitigations	Under mitigation, add the need to provide Millbrae and San Bruno with nurseries to complete nature based, native species restoration as both communities work on flooding issues.	Pre-EIR, EIR, Permits

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Millbrae City Councilmember Ann Schneider	Individual/City	Hydrology and Water Quality - Sediment/Turbidity	How sedimentation and subsidence will work with reduced flow to the Millbrae inlet, incorporating the additional 20 acres SFO is planning on filling in this same general location.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Millbrae City Councilmember Ann Schneider	Individual/City	Hydrology and Water Quality - Algal Blooms/Eutrophication	Research and provide data on potential red tides, animal die backs and decomposition odors as they happen basically yearly here in south San Francisco Bay. This is a serious issue in Mtn. View caused by reduce flow of water in and around the south bay. This same action will begin once your wall option is built. It will change the flow of water in the Millbrae inlet.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Millbrae City Councilmember Ann Schneider	Individual/City	Hydrology and Water Quality; Geology and Soils	Provide detailed soil sample and water samples for the Millbrae inlet and describe what will happen with a wall even if it has small sections that will open and close.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Geology and Soils, Hydrology and Water Quality), Permits
Millbrae City Councilmember Ann Schneider	Individual/City	Recreation	The wall will also block any aquatic recreation from Millbrae. There simply won't be enough room and the naiTow space will quickly fill with sediment. How would kayaks and paddle board navigate narrow gates and all the additional rip rap installed to put the wall up. Would windsurfers even be able to get out given the needs of water starts. How does the wall improve bay access as it now stands?	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation), 60% Design
Millbrae City Councilmember Ann Schneider	Individual/City	Biological Resources - Habitat; Biological Resources - Shorebirds	Millbrae coastline has a healthy marshland, what will the wall option and other alternatives do to this healthy area full of multiple species of shore birds.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Millbrae City Councilmember Ann Schneider	Individual/City	Biological Resources - Birds; Recreation	What will the wall and alternatives do to our healthy bird population and our existing park?	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Millbrae City Councilmember Ann Schneider	Individual/City	Biological Resources - Bird Strikes	Find the study that shows that shorebirds are not detrimental to jet engines contrary to what airports like to claim. See Cornell University who I think conducted the study.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources)
Millbrae City Councilmember Ann Schneider	Individual/City	Hydrology and Water Quality - Local Drainage	How will the wall if in the enclosed position allow Millbrae to drain Millbrae flood waters? Note that we also drain portions of San Bruno via the Lomita Canal and the slope flow of the seasonal wetlands west of 101. How will this be further impacted by Caltrans draining storm water and related pollution into Millbrae's systems.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Millbrae City Councilmember Ann Schneider	Individual/City	Recreation; Aesthetics - Viewshed	What plans does OneShoreline have to improve nature access for the people of Millbrae. What will they see with a wall a hundred feet (a guess since you don't know where you plan to end the wall)? Why should we lose any remaining view we have of San Francisco Bay?	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Aesthetics, Recreation), 60% Design, Permits
Millbrae City Councilmember Ann Schneider	Individual/City	Equity/Environmental Justice	The entire east side of Millbrae is now considered at extreme risk to heat waves (NOAA extreme heat map by census track). What will this removal of the cooling bay waters do to Millbrae? Consider that the constant winds that formally kept Millbrae cool are changing and that heat waves by definition see a reduction in wind. Large bodies of water provide cooling. Also keep in mind that Millbrae has no public pools, no way for people to cool off save in cooling centers which studies show our residents don't want to use.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), NEPA (Environmental Justice)
Millbrae City Councilmember Ann Schneider	Individual/City	Equity/Environmental Justice	Millbrae is now considered an equity focus area. We are in the process of designating certain parts of Millbrae has historic so entities building in our sphere of influence must consider real mitigation actions. We are also working towards environmental justice designation based on the huge negative impacts to the City's economy, environment, public health, infrastructure by regional transportation operations and by regional agency abuse of power over the City. You need to consider these designations as you look at the impacts on the City of Millbrae. And you should look not just at this projects impacts but the long history of Millbrae paying the negative impacts for the greater regional good. This defines the City and its people as an environmental justice community.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), NEPA (Environmental Justice)
Millbrae City Councilmember Ann Schneider	Individual/City	Equity/Environmental Justice	In the end if the result is "Millbrae will suffer but must do so for the regional good" then be aware that this excuse is not acceptable.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), NEPA (Environmental Justice)
Native American Heritage Commission (NAHC)	Agency	Tribal/Cultural Resources; Process - Outreach	The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources.	Pre-EIR (Outreach Plan, LEDPA), EIR (Tribal/Cultural Resources)
Native American Heritage Commission (NAHC)	Agency	Tribal/Cultural Resources; Land Use and Planning - Permits and Approvals	Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Land Use and Planning, Tribal/Cultural Resources), Permits
Native American Heritage Commission (NAHC)	Agency	Tribal/Cultural Resources; Land Use and Planning - Permits and Approvals	Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice...	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Land Use and Planning, Tribal/Cultural Resources), Permits

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Native American Heritage Commission (NAHC)	Agency	Tribal/Cultural Resources; Process - Outreach	Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).	Pre-EIR (Outreach Plan, LEDPA), EIR (Tribal/Cultural Resources)
Native American Heritage Commission (NAHC)	Agency	Tribal/Cultural Resources; Process - Outreach	Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation: a) Alternatives to the project. b) Recommended mitigation measures. c) Significant effects. (Pub. Resources Code §21080.3.2 (a)).	Pre-EIR (Outreach Plan, LEDPA), EIR (Tribal/Cultural Resources)
Native American Heritage Commission (NAHC)	Agency	Tribal/Cultural Resources; Process - Outreach	Discretionary Topics of Consultation: The following topics are discretionary topics of consultation: a) Type of environmental review necessary. b) Significance of the tribal cultural resources. c) Significance of the project's impacts on tribal cultural resources. d) If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).	Pre-EIR (Outreach Plan, LEDPA), EIR (Tribal/Cultural Resources)
Native American Heritage Commission (NAHC)	Agency	Tribal/Cultural Resources	Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including out not limited to, the location, description, and use-of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10	Pre-EIR (LEDPA), EIR (Tribal/Cultural Resources)
Native American Heritage Commission (NAHC)	Agency	Tribal/Cultural Resources	Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following: a) Whether the proposed project has a significant impact on an identified tribal cultural resource. b) Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b))	Pre-EIR (LEDPA), EIR (Tribal/Cultural Resources)
Native American Heritage Commission (NAHC)	Agency	Tribal/Cultural Resources	Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs: a) The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or b) A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).	Pre-EIR (LEDPA), EIR (Tribal/Cultural Resources)
Native American Heritage Commission (NAHC)	Agency	Tribal/Cultural Resources	Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).	Pre-EIR (LEDPA), EIR (Tribal/Cultural Resources)
Native American Heritage Commission (NAHC)	Agency	Tribal/Cultural Resources	Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).	Pre-EIR (LEDPA), EIR (Tribal/Cultural Resources)
Native American Heritage Commission (NAHC)	Agency	Tribal/Cultural Resources	Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources: a) Avoidance and preservation of the resources in place...; b) Treating the resource with culturally appropriate dignity...; c) Permanent conservation easements or other interests in real property...; d) Protecting the resource. (Pub. Resource Code §21084.3 (b))...	Pre-EIR (LEDPA), EIR (Tribal/Cultural Resources)
Native American Heritage Commission (NAHC)	Agency	Tribal/Cultural Resources	Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs: a) The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2. b) The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process. c) The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).	Pre-EIR (LEDPA), EIR (Tribal/Cultural Resources)
Native American Heritage Commission (NAHC)	Agency	Tribal/Cultural Resources; Additional Reference	The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/A_B52TribalConsultation_Cal_EPA_PDF.pdf	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Tribal/Cultural Resources)
Native American Heritage Commission (NAHC)	Agency	Tribal/Cultural Resources	To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions: 1) Contact the appropriate regional California Historical Research Information System (CHRIS) Center (https://ohp.parks.ca.gov/?page_id=30331) for an archaeological records search...	Pre-EIR (LEDPA), EIR (Tribal/Cultural Resources)

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Native American Heritage Commission (NAHC)	Agency	Tribal/Cultural Resources	To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions: 2) If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.	Pre-EIR (LEDPA), EIR (Tribal/Cultural Resources)
Native American Heritage Commission (NAHC)	Agency	Tribal/Cultural Resources	To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions: Contact the NAHC for: A Sacred Lands File search [and]... A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.	Pre-EIR (LEDPA), EIR (Tribal/Cultural Resources)
Native American Heritage Commission (NAHC)	Agency	Tribal/Cultural Resources	Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence. a) Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities. b) Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans. c) Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subs. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.	Pre-EIR (LEDPA), EIR (Tribal/Cultural Resources)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Process - Lack of Detail in NOP	While the description of the Project in the NOP is not specific enough for BCDC staff to comment on every potential issue that could be raised with respect to BCDC's laws and policies, staff has prepared the following comments outlining issues under BCDC's jurisdiction that we would like to see addressed.	Pre-EIR (Updated Alternatives Feasibility Analysis)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Hydrology and Water Quality; Bay Fill; Land Use and Planning	Based on our current understanding of the project, staff have serious concerns about the proposed alternative for an offshore barrier and its potential impacts and staff's ability to find the project consistent with the Commission's San Francisco Bay Plan policies, including those on water surface area, volume, and circulation, fill in the Bay, Water Quality, and regional climate adaptation planning.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Process	Furthermore, while BCDC acknowledges receipt of the project technical reports released to the public on OneShoreline's web site partway through the NOP comment period, we were not able to review them in detail due to the limited time available.	Pre-EIR
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Land Use and Planning	In addition [to SF Bay and in the BCDC shoreline band], portions of the Project are located within Bay Plan-designated "Waterfront Park, Beach" priority use areas. Within the Commission's jurisdiction, projects proposed within these priority use areas must be consistent with the Bay Plan's Recreation policies and any relevant policies specified in Bay Plan Maps 5 and 6.	EIR (Land Use and Planning)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Land Use and Planning	BCDC requests that OneShoreline include mapping of BCDC's jurisdiction in the forthcoming EIR and pay particular attention to potential project impacts that may occur in these areas as they relate to the Commission's policies. The EIR project description should also clearly detail where each component of the project would take place relative to the Commission's jurisdiction.	EIR (Land Use and Planning)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Process - Insufficient Alternatives Analysis	The Water Surface Area and Volume Policy 1 of the Bay Plan states the following: "1) The surface area of the Bay and the total volume of water should be kept as large as possible in order to maximize active oxygen interchange, vigorous circulation, and effective tidal action. Filling and diking that reduce surface area and water volume should therefore be allowed only for purposes providing substantial public benefits and only if there is no reasonable alternative." This policy requires that the project proponent demonstrate that no reasonable alternatives to the barrier exist. To address this requirement, a thorough and detailed alternatives analysis report should be prepared. If requested by OneShoreline, BCDC staff can review and comment on the alternatives analysis report, potentially in consultation with BCDC's Engineering Criteria Review Board (ECRB). This process may be lengthy and we are able to begin this process with OneShoreline whenever requested, ideally prior to preparation of the EIR and prior to submittal of a permit application to BCDC for the proposed Project.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR

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San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Hydrology and Water Quality - Circulation	The Water Surface Area and Volume Policy 2 of the Bay Plan states the following: "2) Water circulation in the Bay should be maintained, and improved as much as possible. Any proposed fills, dikes, or piers should be thoroughly evaluated to determine their effects upon water circulation and then modified as necessary to improve circulation or at least to minimize any harmful effects." To be consistent with this policy, the Project will require modeling of the Bay to assess impacts of the proposed project barrier and pumping systems on present and future water circulation, including such impacts as salinity, tides, shoaling, wave reflection, and their relevance to ecological impacts. Because the intention of this effort is to analyze and minimize impacts to the extent possible, BCDC recommends performing this work prior to preparation of the EIR and also prior to submittal of a permit application to BCDC for the proposed Project. Again, this process may be lengthy and we are able to initiate this process with OneShoreline whenever requested.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Hydrology and Water Quality; Pumping	During the permit application process, BCDC staff will likely request that the ECRB review other modeling efforts to confirm the project complies with BCDC's Safety of Fills policies. Modeling of shoreline protection projects that include pumping systems will need to demonstrate that the conceptual design of the pump station will adequately meet the project objectives under a variety of current and future scenarios. Since the review of the project's engineering design may overlap with the necessary Bay circulation modeling study, we recommend those technical efforts proceed in coordination with each other.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 30/60% Design, EIR (Hydrology and Water Quality), Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Land Use and Planning - Bay Plan Amendment	Regarding in-Bay barriers generally, Bay Plan Water Surface Area and Volume Policy 3 states the following: "Because further study is needed before any barrier proposal to improve water circulation can be considered acceptable, the Bay Plan does not include any barriers. Before any proposal for a barrier is adopted in the future, the Commission will be required to replan all of the affected shoreline and water area." Thus, if the Project were to move forward, it would also require the Commission to first approve a Bay Plan amendment prior to consideration of a BCDC permit, to replan the affected shoreline and water area. The affected areas may extend beyond the diked area. The Bay Plan amendment process is described in Chapter 10 of BCDC's Regulations (California Code of Regulations Title 14, Division 5, Chapter 10, Article 1). In summary, the Regulations require that the entity applying for a Bay Plan amendment complete the application form and enter into a contract with BCDC to fully fund the work involved in processing and acting on the proposed Bay Plan amendments. Amending the Bay Plan requires a public process involving a staff preliminary recommendation, environmental assessment pursuant to CEQA, public hearing, and two-thirds Commission approval. Since a barrier of the type proposed could have far-reaching impacts throughout the Bay system, staff anticipates that such a Bay Plan amendment would require a significant public process to evaluate and many years to complete.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Land Use and Planning)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Bay Fill	Section 66605 of the McAteer-Petris Act sets forth the criteria necessary to authorize placement of new fill in the Bay and certain waterways. It states: (a) That further filling of San Francisco Bay and certain waterways specified in subdivision (e) of Section 66610 should be authorized only when public benefits from fill clearly exceed public detriment from the loss of the water areas and should be limited to water-oriented uses (such as ports, water-related industry, airports, bridges, wildlife refuges, water-oriented recreation, and public assembly, water intake and discharge lines for desalinization plants and power generating plants requiring large amounts of water for cooling purposes) or minor fill for improving shoreline appearance or public access to the bay;	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Bay Fill; Alternatives Analysis	Section 66605 of the McAteer-Petris Act sets forth the criteria necessary to authorize placement of new fill in the Bay and certain waterways. It states: (b) That fill in the bay and certain waterways specified in subdivision (e) of Section 66610 for any purpose should be authorized only when no alternative upland location is available for such purpose;	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Bay Fill	Section 66605 of the McAteer-Petris Act sets forth the criteria necessary to authorize placement of new fill in the Bay and certain waterways. It states: (c) That the water area authorized to be filled should be the minimum necessary to achieve the purpose of the fill;	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Bay Fill; Hydrology and Water Quality; Biological Resources	Section 66605 of the McAteer-Petris Act sets forth the criteria necessary to authorize placement of new fill in the Bay and certain waterways. It states: (d) That the nature, location, and extent of any fill should be such that it will minimize harmful effects to the bay area, such as, the reduction or impairment of the volume surface area or circulation of water, water quality, fertility of marshes or fish or wildlife resources, or other conditions impacting the environment, as defined in Section 21060.5 of the Public Resources Code;	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Hydrology and Water Quality), Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Bay Fill; Geology and Soils	Section 66605 of the McAteer-Petris Act sets forth the criteria necessary to authorize placement of new fill in the Bay and certain waterways. It states: (e) That public health, safety, and welfare require that fill be constructed in accordance with sound safety standards which will afford reasonable protection to persons and property against the hazards of unstable geologic or soil conditions or of flood or storm waters;	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Geology and Soils), Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Bay Fill	Section 66605 of the McAteer-Petris Act sets forth the criteria necessary to authorize placement of new fill in the Bay and certain waterways. It states: (f) That fill should be authorized when the filling would, to the maximum extent feasible, establish a permanent shoreline;	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), Permits

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San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Bay Fill; Process - Outreach	Section 66605 of the McAteer-Petris Act sets forth the criteria necessary to authorize placement of new fill in the Bay and certain waterways. It states: (g) That fill should be authorized when the applicant has such valid title to the properties in question that he or she may fill them in the manner and for the uses to be approved.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Alternatives Analysis; Mitigations	Bay Plan policies on Mitigation require projects to be designed to avoid adverse environmental impacts. Where they cannot be avoided, they should be minimized to the greatest extent practicable, and finally, "measures to compensate for unavoidable adverse impacts to the natural resources of the Bay..." are required. The project in this case is to provide for flood protection and related purposes as described above, not to create a tidal lagoon, thus avoidance includes alternative methods to provide flood control.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR, Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Mitigations	[Bay Plan] policies provide specific criteria for how compensatory mitigation projects should be sited and designed, community involvement in providing compensatory mitigation, when compensatory mitigation should occur relative to the impacts, and how to determine whether banking or in-lieu fee programs are acceptable.	Pre-EIR, EIR, Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Mitigations; Process - Outreach	The policies also state that "Mitigation programs should be coordinated with all affected local, state, and federal agencies having jurisdiction or mitigation expertise to ensure, to the maximum practicable extent, a single mitigation program that satisfies the policies of all the affected agencies."	Pre-EIR (Outreach Plan), EIR, Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Mitigations; Process - Outreach	BCDC recommends that a detailed understanding of impacts and the development of acceptable compensatory mitigation be developed by coordinating with all affected agencies prior to preparing the EIR so that any potential impacts of any necessary compensatory mitigation project are analyzed as well.	Pre-EIR (Outreach Plan), EIR, Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Process - Outreach	As a requirement of the BCDC permitting process, equitable and culturally-relevant community outreach and engagement should be conducted for nearby communities.	Pre-EIR (Outreach Plan)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Recreation; Equity/Environmental Justice	[P]ublic access improvements should not only be consistent with the project, but also incorporate the culture(s) of the local community, and provide "...barrier free access for persons with disabilities, for people of all income levels, and for people of all cultures."	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), NEPA (Environmental Justice)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Process - Outreach; Equity/Environmental Justice	The environmental review process should incorporate culturally-relevant community outreach and engagement efforts, identify whether the Project is in a vulnerable community, and if so, should identify potential disproportionate impacts.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), NEPA (Environmental Justice)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Process - Outreach	Project proponents should conduct such outreach during their planning and design phases of the project and this should not wait until the BCDC permitting process...We encourage OneShoreline and the Cities of Burlingame, Millbrae and San Mateo, to begin this engagement as soon as possible and throughout the project planning and to keep BCDC staff apprised of these efforts.	Pre-EIR (Outreach Plan)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Process - Outreach; Mitigations	As any mitigation options are developed for the project, the proponents should undertake community outreach related to any vulnerable, disadvantaged, and/or underrepresented communities located near the Project site and those communities that are located near the compensatory mitigation site.	Pre-EIR (Outreach Plan), EIR, Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Process - Outreach; Process - Insufficient Alternatives Analysis	Both the cities of Burlingame and Millbrae have prepared sea level rise adaptation plans (ESA 2019 and Climate Ready San Mateo County 2020), neither of which include the proposed project as an alternative.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), EIR
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Land Use and Planning	The City of Burlingame passed an ordinance in late 2021 requiring levees be constructed along the City shoreline, and this work has already begun, pursuant to permits issued by BCDC.	EIR (Land Use and Planning)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Additional Reference	Regional frameworks such as the Adaptation Atlas (SFEI 2019), Baylands Subtidal Goals (2010) and Ecosystem Habitat Goals Update (2015), Adapting to Rising Tides Bay Area (BCDC, 2020), the Bay Adapt Joint Platform (BCDC, 2021) and BCDC's Adaptation Roadmap: A Practitioners Guide (2022) provide important regional context and guidance	Pre-EIR (Updated Alternatives Feasibility Analysis)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Alternatives Analysis - Adaptation Pathways	Staff is happy to work with One Shoreline to provide advice and alignment on adaptation planning.	Pre-EIR (Updated Alternatives Feasibility Analysis)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Alternatives Analysis - Adaptation Pathways	The [OPC] Guidance also promotes an "adaptation pathway" as a planning approach to address the uncertainty and challenges of climate change decision-making. Finally, given that future sea-level rise is uncertain, the Guidance enables consideration of multiple possible futures and allows analysis of the robustness and flexibility of various adaptation approaches across those multiple futures.	Pre-EIR (Updated Alternatives Feasibility Analysis)

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San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Alternatives Analysis - Adaptation Pathways	An adaptation plan for the project should include a framework for evaluating the project over time to accommodate updates in sea level rise science, guidance, and planning. OneShoreline should also consider the adaptability of the Project over time.	Pre-EIR (Updated Alternatives Feasibility Analysis)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Process	The following additional Bay Plan policies are likely to be relevant to this project [not mentioned in 2023 Conceptual Alternatives Analysis]; Safety of Fills; Airports; Public Access; Recreation; Appearance, Design and Scenic Views; Fish, Other Aquatic Organisms and Wildlife; Mitigation; Environmental Justice and Social Equity; Public Trust; Water Quality	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Land Use and Planning), Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Process - Outreach	BCDC staff generally recommends that project proponents begin preapplication consultations on projects, particularly large and/or complex projects, as early as possible.	Pre-EIR (Outreach Plan)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Process - Outreach	The Commission has appointed the Engineering Criteria Review Board (ECRB) to review proposed Bay fill projects for the adequacy of their specific safety provisions and make recommendations concerning these provisions. Based on the size and complexity of the Project as described in the NOP, the Project should be reviewed by the ECRB. Based on the Project's inclusion of public access components and its need to interface with the overall public access network across a broad area, the Project should be reviewed by the DRB. These reviews are typically more effective earlier in the design process because the boards may provide recommendations that will result in changes to the project.	Pre-EIR (Outreach Plan)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Aesthetics	The Bay Plan includes a policy section on Appearance, Design, and Scenic Views upon which the Commission will base its findings for the Project's visual impacts on the Bay. In defining the significance of the Project's aesthetic impacts, please consider the findings and policies in this section, and acknowledge these policies in the regulatory setting of the analysis.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Aesthetics), Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Aesthetics; Additional Reference	BCDC provides additional guidance on the interpretation of these policies in the Public Access Design Guidelines for Shoreline Spaces, particularly in the sections related to Visual Access, Visual Quality, and Bay Setting. Please consider the Guidelines in your evaluation of the Project's potential effects on scenic vistas and scenic resources. The Guidelines are available on BCDC's website (https://www.bcdc.ca.gov/planning/SPLG.pdf).	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Aesthetics), Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Biological Resources	The Bay Plan includes a number of policy sections related to biological resources, including Fish, Other Aquatic Organisms and Wildlife; Tidal Marshes and Tidal Flats; Freshwater Inflow; Subtidal Areas; and Mitigation. Please review the policies and findings in these sections and acknowledge them in the regulatory setting for this analysis.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Biological Resources; Hydrology and Water Quality	As proposed, the Project would isolate a large part of the Bay and is likely to permanently impact the creek, tidal, and subtidal habitats behind the barrier. In addition, the Project has the potential to impact the movement and exchange of freshwater flows, oxygen and other nutrients, sediment, and plant and animal species between the created lagoon and greater Bay, and affect wave action and other hydrodynamics both at the Project site and in other parts of the Bay Area in a manner that could adversely affect sensitive species and habitats. All of these potential impacts should be addressed as part of this environmental analysis.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Hydrology and Water Quality), Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Biological Resources; Hydrology and Water Quality	Furthermore, it is essential that the study area for the biological resources analysis sufficiently captures the realistic extent of probable direct and indirect impacts based on the Bay's hydrology. A discussion of how the study area was determined should be included in the methodology for this analysis.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Hydrology and Water Quality), Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Mitigations	Please note BCDC's expectations for approaching mitigation as established in Mitigation Policy No. 1: "Mitigation is not a substitute for meeting the other requirements of the McAteer-Petris Act."	Pre-EIR, EIR, Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Geology and Soils	Based on our understanding of the project, the Project could result in a substantial risk of loss, injury, or death in the event of seismically induced failure of the proposed barrier or its systems. Thus, the EIR analysis should disclose the potential for failure, all necessary measures that must be in place in order to avoid or mitigate failure, and the potential effects of failure as the result of seismic events such as ground shaking or ground failure. These geology and soils issues would come to light through staff's determination of project consistency with the Bay Plan Safety of Fills policies and the ECRB process.	Pre-EIR (LEDPA), EIR (Geology and Soils)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Biological Resources - Bird Strikes	Bay Plan Airports Policy No. 5 states that "to enable airports to operate without additional Bay filling, tall buildings and residential areas should be kept from interfering with aircraft operations. The Commission should prevent incompatible developments within its area of jurisdiction around the shoreline." In creating a lagoon and introducing habitat features at the Project site, the Project may attract birds that may then present an aviation hazard for San Francisco International Airport. Thus, the Project could constitute an incompatible development. The EIR analysis should include a discussion of the potential for the Project to create an aviation hazard.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Hazards and Hazardous Materials	Should the project include hazardous materials such as diesel fuel tank for backup power for the pump station, this should be included as well.	EIR (Hazards and Hazardous Materials)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Hydrology and Water Quality	The Bay Plan includes policy sections for Water Quality, Water Surface Area and Volume, and Climate Change that are relevant to the EIR's hydrology and water quality analysis. Please review these findings and policies and acknowledge them in the regulatory setting for this issue area. As part of the setting and analysis, please clearly identify the water quality standards, plans, and/or discharge requirements applicable to the Project site.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits

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San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Hydrology and Water Quality - Under Multiple Scenarios	Because the Project is being proposed as sea level rise adaptation, the analysis of its operational impacts on hydrology and water quality would not be complete without the evaluation of each significance criterion under future sea level rise scenarios. This analysis should, at minimum, be conducted to the same standards prescribed by Bay Plan Climate Change Policy No. 2 for sea level rise risk assessments required as part of the permitting process...please ensure that the analysis conducted for the EIR is prepared by a qualified engineer and assesses impacts for the years 2050 and 2100, based on the Ocean Protection Council's 2018 State of California Sea-Level Rise Guidance (currently under revision). The Project warrants an analysis at the State Guidance's medium-high risk level at a minimum...	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Hydrology and Water Quality - Under Multiple Scenarios; Hydrology and Water Quality - Shallow Groundwater Rise	The Project has the potential to alter groundwater hydrology in a way that could decrease fresh groundwater supplies or recharge through such means as blocking groundwater flows or creating interference through the pumping required to maintain the proposed lagoon's water levels. Therefore, EIR analysis should include comprehensive groundwater modeling to assess groundwater impacts from the Project under future sea level rise scenarios.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Risk of Project Failure	The EIR analysis should disclose the potential consequences of Project failure due to emergency events including flood, tsunami, or seiche events and the potential for subsequent flooding to mobilize pollutants in the vicinity of the project.	Pre-EIR (Updated Alternatives Feasibility Analysis)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Land Use and Planning	The Bay Plan should be considered a land use plan adopted for the purpose of avoiding or mitigating an environmental effect, and the EIR land use planning section should include an analysis of the Project's consistency with the Bay Plan's policies...Plan Map 6 Policy No. 17. Coyote Point Recreation Area – Provide full-service public marina. Preserve beach and launching ramp; expand marina. Some fill may be needed. Preserve and improve swimming, windsurfing, picnic, family gathering, museum, interpretive facilities and playgrounds. Allow appropriate concessions. Stabilize shoreline. Potential water trail campsite. Improve access for non-motorized small boats. Protect harbor seal haul-out and pupping site where harbor seals rest, give birth and nurse their young. Projects allowed only if protective of harbor seals and other sensitive wildlife.	EIR (Land Use and Planning)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Land Use and Planning	The Bay Plan should be considered a land use plan adopted for the purpose of avoiding or mitigating an environmental effect, and the EIR land use planning section should include an analysis of the Project's consistency with the Bay Plan's policies...Plan Map 6 Policy No. 18. Bayside Park – Retain lagoon as open water.	EIR (Land Use and Planning)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Land Use and Planning; Biological Resources - Bird Strikes	The Bay Plan should be considered a land use plan adopted for the purpose of avoiding or mitigating an environmental effect, and the EIR land use planning section should include an analysis of the Project's consistency with the Bay Plan's policies...Plan Map 6 Policy No. 19. San Francisco Airport – Further expansion into Bay only if clear need is shown by regional airport system study. Keep runway approach and takeoff areas free from tall structures and incompatible uses.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Land Use and Planning)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Recreation	Sections 66602 and 66632.4 of the McAteer-Petris Act require that every project shall provide maximum feasible public access, consistent with the proposed project, to the Bay and shoreline...Thus, the EIR should note that in order to be permitted by BCDC, the Project will likely be required to construct or expand recreational facilities.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation), 60% Design
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Recreation	Additionally, please note that the Bay itself functions as a recreational facility in the Project's vicinity, as indicated by Plan Map Policy No. 17, quoted above. The EIR should document the recreational uses of the Bay in and around the Project site and evaluate whether the use of the site for the Project would result in a deterioration of the area's ability to continue to support those uses.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation), 60% Design
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Recreation; Monitoring and O&M	Bay Plan Public Access Policy No. 8 requires that new improvements be "designed and built to encourage diverse Bay-related activities and movement to and along the shoreline, should provide barrier free access for persons with disabilities, for people of all income levels, and for people of all cultures to the maximum feasible extent, should include an ongoing maintenance program, and should be identified with appropriate signs, including using appropriate languages or culturally-relevant icon-based signage." Please ensure that these standards are incorporated in the public access proposal for the Project and included in the public services analysis for parks.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR, Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Transportation	Please review the findings and policies in the Bay Plan's sections on Transportation and Public Access and acknowledge them in the regulatory settings for the transportation. Please consider these policies in your analysis of whether the Project would conflict with a policy addressing transit, roadway, bicycle, and pedestrian facilities...[including] the planned alignment of the Bay Trail along the Project site.	Pre-EIR (LEDPA), EIR (Transportation)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Tribal Cultural Resources	Please ensure that the EIR includes a description of the Native American history and cultural resources associated with the Project site.	Pre-EIR (LEDPA), EIR (Tribal/Cultural Resources)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Tribal/Cultural Resources; Process - Outreach	In preparing the EIR, please conduct meaningful outreach towards the tribes associated with this area as part of the AB 52 consultation requirement.	Pre-EIR (Outreach Plan, LEDPA), EIR (Tribal/Cultural Resources)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Tribal Cultural Resources	Additionally, please ensure that the cultural and tribal cultural resources environmental setting identifies all historically and culturally significant resources at the Project site and at any related sites (if applicable), and note in the analysis whether and how the Project will acknowledge or incorporate information about those resources in its design or programming.	Pre-EIR (LEDPA), EIR (Tribal/Cultural Resources)

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San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Hydrology and Water Quality - Coast Hazards; Hydrology and Water Quality - Local Drainage	Utilities and Service Systems within BCDC jurisdiction on this project is expected to relate to storm drains and pumping and power systems for the pump station. Please ensure the EIR describes measures in the design to address the reliability and redundancy of the utilities and service systems necessary for the project and any impacts these utilities and systems may have. Please ensure the impacts of the project on the coastal storm drain and sewer systems are also addressed, in current and future scenarios.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Alternatives Analysis	[Policies in the Bay Plan] relevant to the selection and evaluation of alternatives for the EIR: Tidal Marshes and Tidal Flats Policy No. 1, which states that “filling, diking, and dredging projects that would substantially harm tidal marshes or tidal flats should be allowed only for purposes that provide substantial public benefits and only if there is no feasible alternative.”	Pre-EIR (Updated Alternatives Feasibility Analysis)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Alternatives Analysis	[Policies in the Bay Plan] relevant to the selection and evaluation of alternatives for the EIR: Subtidal Areas Policy No. 2, which states that “subtidal areas that are scarce in the Bay or have an abundance and diversity of fish, other aquatic organisms and wildlife should be conserved. Filling, changes in use, and dredging projects in these areas should therefore be allowed only if: (a) there is no feasible alternative; and (b) the project provides substantial public benefits.”	Pre-EIR (Updated Alternatives Feasibility Analysis)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Alternatives Analysis - Adaptation Pathways	Therefore, the alternatives evaluated in the EIR should include at least one alternative that is sited upland of the Bay, and at least one alternative that reduces or eliminates the amount of fill proposed. The EIR should also consider at least one alternative that uses the concept of “adaptive pathways,” that allows for a more gradual response to climate change impacts. If all such alternatives are determined to be infeasible and not appropriate to include in the EIR analysis, please include a detailed discussion of why the alternatives are infeasible and how the determination was made.	Pre-EIR (Updated Alternatives Feasibility Analysis)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Alternatives Analysis	Please note that the McAteer-Petris Act does not consider cost as a factor when determining whether an alternative upland location is available.	Pre-EIR (Updated Alternatives Feasibility Analysis)
San Francisco Bay Conservation and Development Commission (BCDC)	Agency	Alternatives Analysis; Biological Resources - Habitat; Hydrology and Water Quality	Please ensure that the analysis of the alternatives includes comparisons of environmental impacts on tidal marshes and tidal flats and subtidal ecosystems.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Hydrology and Water Quality), Permits
San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Process - Lack of Detail in NOP	The NOP provides no details regarding the proposed design or operation of the barrier or any associated shoreline features.	Pre-EIR (Updated Alternatives Feasibility Analysis)
San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Additional Reference; Nature-Based Solutions	To help agencies such as OneShoreline address these complex challenges, the Water Board has funded and contributed to numerous planning guidance documents aimed at helping communities improve their adaptive capacity to climate change in ways that protect, enhance, and restore the region’s sensitive ecosystems. These documents include the 2015 update of the Baylands Ecosystem Habitat Goals (Goals Project 2015), which calls for the accelerated restoration of 100,000 acres of tidal wetland and associated habitats by 2030, and the San Francisco Bay Shoreline Adaptation Atlas (SFEI and SPUR 2019, additional updates in-progress), which proposes a sciencebased framework for identifying opportunities to deploy nature-based infrastructure along the Bay’s shoreline.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), Permits
San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Process - Outreach	However, it is our understanding that key project partners, including municipalities, regulatory agencies, land managers, and related authorities were minimally consulted during Project development. We strongly encourage OneShoreline to collaborate early and often with the Water Board and our regulatory and community partners to develop a Project that provides the necessary flood protection for the region while complying with requisite environmental policies and regulations.	Pre-EIR (Outreach Plan)

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San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Hydrology and Water Quality	Water Board staff have serious concerns that this alternative will result in significant, unmitigable impacts to waters of the State and assigned beneficial uses of waters of the State.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Alternatives Analysis	Under the authority of the Porter-Cologne Act, the Water Board has developed and implements the San Francisco Bay Basin Water Quality Control Plan (Basin Plan), which defines the beneficial uses of waters of the State within the SF Bay. Given the proposed Project's location along the shoreline of SF Bay and local tributaries, the following beneficial uses likely apply to waters and wetlands in the Project area: estuarine habitat (EST); preservation of rare and endangered species (RARE); contact water recreation (REC1); non-contact water recreation (REC2); shellfish harvesting (SHELL); fish spawning (SPWN); and wildlife habitat (WILD). The EIR must consider the reasonably foreseeable potential direct, indirect, and cumulative impacts of Project alternatives on these current and anticipated future beneficial uses of waters of the State.	Pre-EIR (Updated Alternatives Feasibility Analysis)
San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Bay Fill; Alternatives Analysis	The Guidelines and Dredge and Fill Procedures prohibit discharges of fill material into waters of the United States and the State unless a discharge, as proposed, constitutes the least environmentally damaging practicable alternative (LEDPA) that will achieve the project purpose. To accomplish this, the Guidelines and Procedures sequence the order in which proposals must be approached: 1) Avoid - avoid impacts to waters; 2) Minimize – once impacts have been avoided to the maximum extent practicable, modify the project to minimize impacts to waters; and 3) Compensate – once impacts have been fully minimized, compensate for unavoidable impacts to waters.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), Permits
San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Existing Conditions	The NOP describes a significant offshore barrier that would fundamentally alter the physical and ecological processes that sustain beneficial uses in the Project area. The Project area supports a variety of aquatic habitat types, including open water, intertidal and shallow subtidal mudflats, eelgrass beds, and tidal wetlands, some of which are known to support special-status species such as the federally- and state-endangered Ridgway's rail (<i>Rallus obsoletus</i>). Though much of the shoreline is armored, small pocket beaches have formed in some areas from coarse material that has eroded over time from the armoring.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Project Setting)
San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Existing Conditions; Additional Reference	Before the area was diked off from the Bay in the late 19th and early 20th centuries, it supported extensive tidal wetlands and mudflats, including some of the largest native oyster beds in SF Bay. By the late 19th century, these oyster beds were used to support a major non-native oyster cultivation industry; when that industry eventually collapsed due to poor water quality in the Bay, the shell beds were then mined to develop concrete (Booker 2013, Down By The Bay: San Francisco's History Between The Tides. University of California Press). Small pocket beaches of oyster shell hash persist in the region, including at SFO.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Project Setting)
San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Hydrology and Water Quality - Algal Blooms/Eutrophication	This approach is likely to drive significant negative impacts to water quality by increasing the hydraulic residence time of interior waters, which can exacerbate eutrophication, increase the risk of harmful algal blooms, and decrease dissolved oxygen (DO) to levels below those that can sustain fish, benthic macroinvertebrates, and other aquatic life.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Hydrology and Water Quality - Sediment/Turbidity	By reducing physical connectivity between the Bay and almost 4 miles of shoreline, the barrier would likely interrupt sediment flux between local watersheds, shoreline habitats, and the Bay, increasing the risk of shoreline erosion.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Biological Resources - Fish; Biological Resources - Wildlife Migration and Movement	The barrier would also likely impede the free movement of fish and wildlife through the region, including by special-status and/or key food web support species such as green sturgeon (<i>Acipenser medirostris</i>), steelhead (<i>Oncorhynchus mykiss</i>), and Pacific herring (<i>Clupea pallasii</i>).	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Hydrology and Water Quality	Tide gates are not a panacea to the water quality threats described above. In many managed tidal systems in SF Bay, key water quality indicators such as temperature, DO, sulfide concentrations, and methylmercury concentrations are frequently negatively impacted in enclosed basins managed by tide gates, especially during summer months.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Hydrology and Water Quality	When tide gates are opened to drain, the drainage of this water into the open Bay can adversely affect water quality and beneficial uses in the receiving waters. Another consideration is the projected future increase in the intensity, frequency, and duration of extreme storm events driven by climate change. Given the intensely developed condition of the watersheds that drain to the proposed enclosed tidal lagoon, storm events could drive large pulses of urban runoff into the lagoon and drive acutely poor water quality conditions.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Monitoring and O&M; Alternatives Analysis - Adaptation Pathways; Geology and Soils	Further, it is unclear how the barrier would be maintained over time, whether the barrier would need to be raised in response to rising tides, and whether the Bay Muds underlying the barrier would have bearing capacity sufficient to support the barrier over time.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR (Geology and Soils), Permits
San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Nature-Based Solutions	Unfortunately, the NOP does not reference any Project alternatives that utilize nature-based or hybrid "green-grey" approaches. It is not clear what the NOP means by stating that the proposed barrier alternative "has been described as a 'living shoreline' in other contexts" (NOP page 2); the Water Board does not consider this alternative to constitute a living shoreline.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), Permits

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San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Nature-Based Solutions; Bay Fill; Alternatives Analysis; Process - Outreach	To comply with the Dredge and Fill Procedures, the Water Board must analyze alternatives that first avoid and minimize impacts to waters of the State. We therefore strongly encourage OneShoreline to develop and analyze practicable alternatives to the proposed Project alternative that incorporate nature-based approaches and reduce/minimize traditionally engineered structural components that interfere with natural physical and ecological processes. We are happy to work with OneShoreline and its partners to collaboratively develop these alternatives using resources such as the Adaptation Atlas and related literature.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), Permits
San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Alternatives Analysis	Since the 401 Certification process will require a sequential analysis of avoiding, minimizing, and then compensating the Project's impacts to the extent practicable, we recommended that OneShoreline utilize the same alternatives development approach for the EIR and the required 404(b)(1) Alternatives Analysis that will be prepared for this Project.	Pre-EIR (Updated Alternatives Feasibility Analysis)
San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Hydrology and Water Quality	This analysis should consider the potential intensity, frequency, and duration of future storm events in watersheds draining to the Project area in addition to the potential range of sea level rise in the Bay over the intended lifespan of the Project.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Hydrology and Water Quality; Biological Resources	[The EIR analysis] should address how the alternatives will impact existing and future patterns of tidal and watershed flooding, sediment erosion/deposition/transport, vegetation establishment/dispersion/succession, and related physical and ecological processes...	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Hydrology and Water Quality), Permits
San Francisco Bay Regional Water Quality Control Board (SFRWQCB)	Agency	Biological Resources - Fish; Biological Resources - Wildlife Migration and Movement	It should also address the impacts of Project alternatives on the safe movement of fish and wildlife within and between the Bay, the region's bayland and shoreline habitats, and terrestrial habitats in contributing local watersheds.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
San Francisco Bay Trail Project	Recreation Organization	Recreation - Bay Trail; Additional Reference	Below are links to the SFO Gap Study referenced in the comment letter as well as a link to the Bay Trail Design Guidelines to assist in the design and development of the Bay Trail as this project progresses. https://mtc.ca.gov/operations/regional-trails-parks/san-francisco-bay-trail/bay-trail-sfo-gap-study https://mtc.ca.gov/sites/default/files/documents/2021-10/Bay-Trail-Design-Guidelines-and-Toolkit.pdf	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation), 60% Design, Permits
San Francisco Bay Trail Project	Recreation Organization	Recreation - Bay Trail; Existing Conditions	Due to its nature as a shoreline trail, the existing and planned Bay Trail alignment runs along the entire length of the MBSAPE Project site...The Bay Trail is recognized in both the Metropolitan Transportation Commission's (MTC) Regional Active Transportation Plan and Plan Bay Area 2050 as a critical regional transportation corridor.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Project Setting, Recreation), 60% Design, Permits
San Francisco Bay Trail Project	Recreation Organization	Recreation - Bay Trail; Mitigations	...the proposed EIR must evaluate and analyze the project's impacts on both the existing and planned Bay Trail alignment. Any impacts on the existing and planned Bay Trail alignment must be identified and mitigated in the EIR. Mitigation measures should include the rebuild of the existing Bay Trail and the completion of the planned Bay Trail segments within the project area.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation), 60% Design, Permits
San Francisco Bay Trail Project	Recreation Organization	Recreation - Offshore Trail; Recreation - Bay Trail	Since the trail proposed with the lagoon barrier would meet the Bay Trail goals of providing a "Bay" experience for trail users, the EIR should evaluate the trail on the lagoon barrier as a possible future Bay Trail alignment designed to accommodate both pedestrians and bicyclists. The trail on the lagoon barrier would provide a more direct route for people using the Bay Trail as an active transportation corridor.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation), 60% Design, Permits
San Francisco Bay Trail Project	Recreation Organization	Recreation - Bay Trail; Land Use and Planning	We also request that the EIR evaluates the consistency of the MBSAPE Project with all regional, countywide, and local plans that call for the completion of the Bay Trail.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation, Land Use and Planning), 60% Design, Permits
San Francisco Bay Trail Project	Recreation Organization	Recreation - Bay Trail; Land Use and Planning	The EIR should also evaluate and analyze the impacts of any projects proposed on adjacent properties that in conjunction with the MBSAPE Project may affect the ability to complete the Bay Trail and maintain the Bay Trail's connectivity especially north towards the San Francisco International Airport (SFO).	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation, Land Use and Planning), 60% Design, Permits
San Francisco Bay Trail Project	Recreation Organization	Additional Reference; Process - Outreach; Recreation - Bay Trail	MTC is currently in the process of developing a Bay Trail SFO Gap Study, which is evaluating potential alignments for completing the Bay Trail northward through the SFO area. Although the Bay Trail SFO Gap Study is still in progress, the development of this EIR should review and consider the available materials from that study in its evaluation and analysis of impacts to the Bay Trail. Please coordinate with the San Francisco Bay Trail Project in the process of developing the Draft EIR.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), EIR (Recreation), 60% Design, Permits
San Francisco Baykeeper	Environmental Organization	Hydrology and Water Quality; Regional Precedent	This project proposes to protect only a fraction of the of the Bay's inhabitants. Our definition of a regional approach is one that collectively contributes to the larger area's adaptation goals rather than focusing so narrowly on the project footprint that the potential for negative impacts (e.g., flooding in other parts of the Bay Area) are ignored...The models that Wang et al. (2018) formulated indicate that hardening the shoreline or using containment strategies in the South Bay strongly alter hydrology in the Central Bay and ultimately raise water levels. Therefore, it is imperative that the EIR evaluates the effects this project will have on surrounding communities ranging from the North Bay to the South Bay and the overall hydrodynamic effect on the Bay's water levels to mitigate the risk to other communities beyond the project area.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits

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San Francisco Baykeeper	Environmental Organization	Hydrology and Water Quality	Additionally, this preferred project alternative will likely have a negative impact on water quality. The design of the project will reduce tidal flow with the creation of an offshore barrier and developed lagoon system. Reducing tidal flow will lead to stagnation of the water column, higher water temperatures, and lower turbidity.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
San Francisco Baykeeper	Environmental Organization	Hydrology and Water Quality - Algal Blooms/Eutrophication	These water conditions are favorable to the formation of harmful algal blooms (HABs). This region was severely impacted in 2022 by the Hertosigma akashiwo red tide and massive fish kill. This project is likely to facilitate the formation of more HABs in the future, which will impact fisheries and endangered fish species.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
San Francisco Baykeeper	Environmental Organization	Proven Examples; Hydrology and Water Quality	Neighboring cities such as Foster City and Redwood Shores, which are developed lagoon systems, have some of the poorest water quality in the Bay. Die offs of sharks and rays occur due to low dissolved oxygen levels and lack of water flow.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
San Francisco Baykeeper	Environmental Organization	Biological Resources - Habitat	Adding fill to the Bay to create an offshore barrier reduces the amount of habitat available for wildlife especially under rising sea levels. As ecosystems dwindle due to the lack of upland retreat, their capacity and ultimately ours become less resilient. Therefore, it is crucial to foster healthy ecosystems and habitats to enhance biodiversity and create resilient communities.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
San Francisco Baykeeper	Environmental Organization	Process - Request to Reissue NOP/Reconsider Preferred Alternative	We strongly encourage you to reconsider this project as it is currently planned.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA)
San Francisco Boardsailing Association (SFBA)	Recreation Organization	Process - Outreach	...we look forward to working with OneShoreline to develop a plan that will work for all.	Pre-EIR (Outreach Plan)
San Francisco Boardsailing Association (SFBA)	Recreation Organization	Process - Outreach	Given the scope of the change proposed in your design and its existential impact on the Bay, it is imperative that a broader coalition of Bay stakeholders be included before ushering a project of this scope so far in the design process. In addition, the short notice of meetings & public comment windows was not adequate to gather stakeholder input and factor those requirements into your design.	Pre-EIR (Outreach Plan)
San Francisco Boardsailing Association (SFBA)	Recreation Organization	Nature-Based Solutions	While there are many possible design solutions, the proposed plan is a non-starter for many reasons. Most importantly, hardening solutions such as the one proposed can be better achieved with nature-based softening. Modern restorative shoreline techniques that harness nature-based shoreline rise are well-studied, tested, and available. Any shoreline designs should prioritize these resilient solutions before reverting to the highly problematic armored designs.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), Permits
San Francisco Boardsailing Association (SFBA)	Recreation Organization	Process - Outreach	As strong advocates for Bay resilience, we have been working on shoreline restoration for decades and have a portfolio of available solutions that elegantly balance a healthy ecology and support bay access. While we are deeply concerned with the proposed design, we look forward to bringing our experience, expertise and community support to provide resilient solutions that avoid hard-armoring the San Francisco Bay.	Pre-EIR (Outreach Plan)
San Francisco International Airport (SFO)	Property Owner	Project Need	SFO and OneShoreline have coordinated for some time on shoreline protection from storm surge coastal flooding and future sea level rise from climate change. Our collective preference has been to tie into each other's systems to cumulatively protect the inland. The Airport agrees and believes this to be an important common goal.	Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), EIR
San Francisco International Airport (SFO)	Property Owner	Process - Outreach	However, we are disappointed there have been no discussions or outreach to SFO about this Proposed Project which is now the subject of an EIR.	Pre-EIR (Outreach Plan)
San Francisco International Airport (SFO)	Property Owner	Process - Land Rights	A significant portion of the Proposed Project is located on Airport land that is owned by the City and County of San Francisco and OneShoreline lacks the legal rights to construct on that property. For the reasons described below, the Airport will not grant OneShoreline the right to operate and maintain the Proposed Project as currently designed on its property.	Pre-EIR (Updated Alternatives Feasibility Analysis)
San Francisco International Airport (SFO)	Property Owner	Process - Lack of Detail in NOP	Based on the limited information in the NOP, the Airport understands the Proposed Project consists of creating a new tidal lagoon through the construction of an approximately 2.65-mile-long offshore barrier from SFO to Fisherman's Park in Burlingame.	Pre-EIR (Updated Alternatives Feasibility Analysis)
San Francisco International Airport (SFO)	Property Owner	Process - Land Rights	The western end of the proposed offshore barrier would be located on land owned by the City and County of San Francisco. Construction of the offshore barrier would require OneShoreline to obtain from SFO legal rights to about 835 acres of real property, as well as future access rights to maintain and operate this berm and lagoon.	Pre-EIR (Updated Alternatives Feasibility Analysis)
San Francisco International Airport (SFO)	Property Owner	Process - Outreach; Process - Land Rights	OneShoreline has not contacted SFO to discuss the Proposed Project, including seeking permission to obtain the legal rights necessary to use Airport property or to understand the requirements to access Airport property for construction and maintenance activities.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis)
San Francisco International Airport (SFO)	Property Owner	Process	...if the Airport were to grant OneShoreline the legal rights necessary to construct and operate the Proposed Project in some form, the City and County of San Francisco would need to be a responsible agency under CEQA for this EIR.	Pre-EIR
San Francisco International Airport (SFO)	Property Owner	Biological Resources - Bird Strikes	The creation of new wildlife habitat would attract birds, which pose a significant safety hazard to aircraft and passengers that are taking off or landing at SFO – and to the wildlife. While the Airport supports biodiversity, Airport land is actively managed to reduce wildlife attractants at SFO. A bird strike that disables an aircraft engine could result in the catastrophic loss of human life, impacting hundreds of passengers and crew on the plane and potentially even more people on the ground.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources)

Commentor	Commentor Affiliation	Topic	Comment	As of June 2024, when does OneShoreline currently expect this comment to be addressed? (Pre-EIR, EIR, 30/60% Design, Permits)
San Francisco International Airport (SFO)	Property Owner	Biological Resources - Bird Strikes; Land Use and Planning - Permits and Approvals	As a federally obligated public use Airport, SFO is required to adhere to all FAA rules, orders, advisory circulars, regulations, and standard operating procedures. FAA Advisory Circular (AC) 150/5200-33C, Hazardous Wildlife Attractants On or Near Airports, requires airports to maintain a separation distance of 10,000 feet between the closest point of a U.S. airport's aircraft operations area and the hazardous wildlife attractant(s). Paragraph 1.4, Protection of Approach, Departure, and Circling Airspace, of AC 150/5200-33C applies to all federally obligated U.S. airports and requires a distance of five miles between the closest point of an airport's aircraft operations area and the hazardous wildlife attractant(s).	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Land Use and Planning), Permits
San Francisco International Airport (SFO)	Property Owner	Biological Resources - Bird Strikes; Land Use and Planning - Permits and Approvals	Lastly, the creation of new wildlife habitat would not be consistent with the airspace protection policies of the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (SFO ALUCP), as adopted by the City/County Association of Governments of San Mateo County (C/CAG) and implemented by the State-required and County-designated Airport Land Use Commission (ALUC).	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Land Use and Planning), Permits
San Francisco International Airport (SFO)	Property Owner	Recreation - Offshore Trail; Tie-In Location - SFO; Hazards and Hazardous Materials	If a pedestrian trail is included as part of the offshore barrier, there are safety and security concerns that must be addressed in the EIR with respect to how the levee/berm would be operated and maintained. The western end of the offshore barrier would connect directly to the Airport perimeter seawall, providing direct access to active runways and taxiways. Under SFO's Shoreline Protection Program, this specific section of the perimeter seawall is slated to be about four feet above ground level, which would render the airfield easily accessible by the public from OneShoreline's proposed levee/berm... The EIR should discuss how and where access to the pedestrian trail would be provided, the hours that the pedestrian trail would be accessible to the public, and how OneShoreline would implement active security measures such as cameras and security guards to prevent access onto the Airport's secure airfield. A publicly accessible trail so close to the airfield could compromise the safety of passengers, Airport employees, and the safe and efficient navigation of aircraft.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), 30/60% Design, EIR (Recreation, Hazards and Hazardous Materials)
San Francisco International Airport (SFO)	Property Owner	Land Use and Planning - Permits and Approvals	The Proposed Project site is within two Airport Influence Areas (AIAs): Area A – Real Estate Disclosure Area (all of San Mateo County) and Area B – Policy/Project Referral Area (a smaller subarea in the northern part of San Mateo County), as defined by the SFO ALUCP. Within Area A, the real estate disclosure requirements of state law apply (see attachment). A property owner offering a property for sale or lease must disclose the presence of planned or existing airports within two miles of the property. Within Area B, the Board of Directors of the C/CAG, acting as the designated ALUC, shall review proposed land use policy actions, including new general plans, specific plans, zoning ordinances, plan amendments and rezonings, and land development proposals (see attachment). The real estate disclosure requirements in Area A also apply in Area B. The EIR should identify responsible parties for maintaining compatibility and responsible actions under the C/CAG-adopted SFO ALUCP.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Land Use and Planning), Permits
San Francisco International Airport (SFO)	Property Owner	Land Use and Planning - Permits and Approvals	In addition, prior to issuance of any demolition or construction permits, OneShoreline as project applicant must provide appropriate notification of proposed construction to the FAA via FAA Form 7460-1 (Notice of Proposed Construction or Alteration) and must receive a Determination of No Hazard to Air Navigation from the FAA and meet all conditions identified in the determination prior to raising cranes or other tall construction equipment within the FAA airspace review areas. Violation of the FAA review standard by OneShoreline could result in direct and adverse financial impacts to airlines operating scheduled flights and to the local airport.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Land Use and Planning), Permits
San Francisco International Airport (SFO)	Property Owner	Land Use and Planning - Permits and Approvals; Process - Outreach	Quantitative analyses and studies of predicted aircraft operations and operational impacts related to instrumented procedures and associated NAVAIDS must be examined. These must include analyses to consider regulatory takeoff performance requirements of current and future aircrafts departing from the Airport. Shifts to current operational departures and arrivals away from current runways would lead to operational delays which may then consequently affect the capacity of the Airport and even create National Airspace System (NAS) level delays. OneShoreline must perform these quantitative analyses to determine operational impacts and confer with and obtain approval from the FAA for how the Proposed Project would impact their federal systems, and operations that would be required as a result of OneShoreline's Proposed Project. Non-federal actions impacting federal NAVAIDS are paid for by the project applicant, or OneShoreline under this Proposed Project. OneShoreline is urged to engage the FAA for potential impacts and requisite actions to their NAVAIDS and to SFO as a major international airport and port of entry for the US West Coast service area.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), EIR (Land Use and Planning), Permits
San Francisco International Airport (SFO)	Property Owner	Alternatives Analysis - New Alternative	One of the project alternatives that should be discussed and analyzed in the EIR is an alternative that is located entirely off of City and County of San Francisco property; and a non-nature-based shoreline protection system that does not create new wildlife habitat immediately adjacent to the Airport that would adversely affect safety and security of passengers, the public, and wildlife that would be attracted to the Airport.	Pre-EIR (Updated Alternatives Feasibility Analysis)
San Francisco International Airport (SFO)	Property Owner	Air Quality	The EIR should include a technical background study that quantifies construction-related air quality emissions, especially if marine vessels (e.g., barges, skiffs, crew boats) would be used to construct the offshore barrier and transport equipment and materials to and from the Proposed Project site, including consideration of source and transport of SF Bay fill materials. All sensitive receptors (i.e., residential uses, workers, healthcare facilities, childcare facilities, and schools) within 1,000 feet of the Proposed Project site should be included in the air quality and health risk assessment modeling.	EIR (Air Quality)

Commentor	Commentor Affiliation	Topic	Comment	As of June 2024, when does OneShoreline currently expect this comment to be addressed? (Pre-EIR, EIR, 30/60% Design, Permits)
San Francisco International Airport (SFO)	Property Owner	Biological Resources	The EIR should include a technical background study that identifies vegetation communities and wildlife habitat, special-status plant and animal species, sensitive natural communities (including wetlands), and wildlife corridors that are present on the Proposed Project site and in its vicinity. The EIR should analyze whether construction and operation of the Proposed Project would result in any impacts on these biological resources.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
San Francisco International Airport (SFO)	Property Owner	Biological Resources - Ridgway's Rail	The Proposed Project would include fill of City and County of San Francisco property supporting mudflats that provides natural flood protection in its existing state, and is habitat for the California Ridgway's rail, a federally- and state-listed endangered species. Construction of the offshore barrier would create a tidal lagoon that would flood this habitat and permanently impact this species. The population of the California Ridgway's rail has acclimated to the aircraft operations and has not been a source of aircraft/wildlife strikes. The EIR should acknowledge and identify compensatory mitigation for the Proposed Project's permanent impacts to species habitat and describe how to mitigate species "take" as defined under federal and California Endangered Species Acts.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
San Francisco International Airport (SFO)	Property Owner	Biological Resources - Fish	SF Bay waters are defined as critical habitat for various federal and state listed fish species. The EIR should address impacts to these fish species and identify associated compensatory mitigation for permanent fill of fish habitat.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
San Francisco International Airport (SFO)	Property Owner	Land Use and Planning - Permits and Approvals; Process - Land Rights	OneShoreline is advised that Airport approval must be obtained to analyze and submit a report to resource agencies (e.g., California Department of Fish and Wildlife) for land owned by the City and County of San Francisco.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Land Use and Planning), Permits
San Francisco International Airport (SFO)	Property Owner	Hydrology and Water Quality - Sediment/Turbidity	Hydrodynamic modeling and wave modeling should be conducted to quantify changes to the Bay's coastal hydraulics, and the EIR should analyze whether the Proposed Project would result in changes to sediment transport, the Bay's bed (bottom) elevation, and water quality.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
San Francisco International Airport (SFO)	Property Owner	Hydrology and Water Quality - Sediment/Turbidity	The EIR should discuss the rate of sedimentation into such a lagoon system, how sedimentation would be addressed, including frequency of dredging to account for unabated sediment and other urban runoff that flows directly into SF Bay waters, and how the lagoon would be maintained so that it continues to properly convey stormwater runoff into the SF Bay.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
San Francisco International Airport (SFO)	Property Owner	Hydrology and Water Quality - Local Drainage	The EIR should also address how the Proposed Project would impact and mitigate the Airport's storm drain pump station and associated detention basin serving the entire southern airfield and runways. Under OneShoreline's Proposed Project, this storm drain pump station would not be able to function as currently designed and the outfall pipes would be enclosed within the proposed lagoon.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
San Francisco International Airport (SFO)	Property Owner	Noise; Construction Methods	The EIR should analyze construction methods and associated construction-related noise impacts to adjacent commercial uses in Millbrae and Burlingame.	Pre-EIR (Updated Alternatives Feasibility Analysis), 60% Design, EIR (Noise), Permits
San Francisco International Airport (SFO)	Property Owner	Noise	A significant noise consideration is if the Proposed Project would result in temporary construction related closures or shifts of aircraft departures and arrivals, and therefore result changes to aircraft noise patterns. This EIR should analyze temporary changes to aircraft noise and potential impacts to adjacent communities in Millbrae, Burlingame, San Bruno, South San Francisco and also noise impacts in the Airport's noise corridor.	EIR (Noise), Permits
Save the Bay	Environmental Organization	Process - Request to Reissue NOP/Reconsider Preferred Alternative	We have appreciated OneShoreline's willingness to grapple with the challenge of designing effective flood protections for San Mateo County. However, the Notice of Preparation and its supporting documents raise significant concerns about the agency's approach in this case, and the selection at this point of a "preferred alternative" is premature. Should this process move forward, we urge you to rescind the selection of a preferred alternative and conduct full and complete analyses of the environmental impacts of the full range of feasible alternatives to meet the project's flood protection goals while minimizing negative impacts to the Bay.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA)
Save the Bay	Environmental Organization	Process - Insufficient Alternatives Analysis; Land Use and Planning - Permits and Approvals	In conducting the feasibility analysis of the three proposed alternatives, emphasis was given to engineering and design considerations, land acquisition costs, construction schedule, utility and roadway impacts, and impacts on private real estate. Fleeting acknowledgement is given to the reality of the permitting challenges for the alternatives considered...Failure to consider the reality of the permitting hurdles for these alternatives renders the determination of which project is ultimately the most "feasible" incomplete and calls into question the cost and timeline considerations related to permitting for each of the alternatives considered.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Land Use and Planning), Permits
Save the Bay	Environmental Organization	Process - Insufficient Alternatives Analysis	The evaluation of impacts to the Bay itself within the feasibility analysis primarily relies upon an assessment of tidal function, whereas the full scale of the proposed project's impacts to the Bay itself and not fully considered. While we recognize that the full EIR will consider these impacts in more detail, the limited scope of these analyses at this point further calls into question OneShoreline's determination of a "preferred alternative".	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR
Save the Bay	Environmental Organization	Process - Insufficient Alternatives Analysis; Hydrology & Water Quality; Biological Resources	Fish passage, salinity, water temperature, dissolved oxygen, nutrient loading, tidal flushing, and other habitat functions will be altered by these proposals, and all have the potential to have lasting and dramatic impacts on the Bay and its wildlife. These impacts are likely to be greatest in the lagoon structure envisioned by Alternative #3. While some of these impacts are given passing consideration in the biological and hydrological analyses in appendices A and E, they are not taken into consideration in the narrative discussion of the feasibility analysis to determine each alternative's "impact on the Bay". Without such consideration, the scoring of each alternative is incomplete and the conclusion that any project is a "preferred alternative" is very premature.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits

Commentor	Commentor Affiliation	Topic	Comment	As of June 2024, when does OneShoreline currently expect this comment to be addressed? (Pre-EIR, EIR, 30/60% Design, Permits)
Save the Bay	Environmental Organization	Process - Insufficient Alternatives Analysis; Process - Outreach; Regional Precedent	OneShoreline, being ahead of most other counties in looking forward to the risk that climate change brings, has the potential to set a precedent for how our region designs and thinks about this challenge. Rather than identifying a preferred alternative based on an incomplete analysis of the project's feasibility and impacts and with limited public and stakeholder engagement, OneShoreline should undertake a balanced and thorough analysis of all project alternatives to best identify the range of options that are not only likely to meet the projects goals, but in a way that has the least negative impact on the Bay and its habitats.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), EIR
Save the Bay	Environmental Organization	Land Use and Planning	We were encouraged by OneShoreline's role in advising Burlingame on the adoption of its shoreline zoning overlay district in 2021, which included shared responsibility for flood protection between landowners and the city and proposed new building standards and land use restrictions to reduce flood hazards in the project area. In constrained areas that are highly developed like Burlingame, cities should also consider additional land use changes to accommodate rising tides and swelling creeks and reduce the scope and scale of engineered protections.	EIR (Land Use and Planning)
Save the Bay	Environmental Organization	Process - Request to Reissue NOP/Reconsider Preferred Alternative	For this reason and those outlined above, we encourage you to reconsider the approach that the NOP has outlined of preselecting a "preferred alternative" and conduct a more balanced consideration of the potential projects to protect the residents of Burlingame and Millbrae from future flood risk.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA)
Sequoia Audubon Society	Environmental Organization	Existing Conditions	San Francisco Bay has lost 96 percent of its historical wetlands; measures for protection of shoreline communities from rising waters must also provide forage and high-tide refuge for the birds that use the mudflats, marsh areas, and Bay waters.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Project Setting)
Sequoia Audubon Society	Environmental Organization	Process - Insufficient Alternatives Analysis	We are concerned that the NOP and its appendices do not provide sufficient basis to adequately evaluate the impact on biological resources of the two project alternatives that were presented in a Scoping Meeting on November 2, 2023. - Conceptual Alternative 3, stated to be the preferred alternative – an offshore barrier with tidal gates. - Conceptual Alternative 2, a shoreline barrier with tidal gates	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR
Sequoia Audubon Society	Environmental Organization	Process - Insufficient Alternatives Analysis; Biological Resources	We have two major concerns regarding data gaps in the information included with the NOP. These data gaps should be addressed in the Environmental Impact Report (EIR): No site-specific biological resource data for offshore areas. The scope of the Biological Resources Constraints Analysis was limited to a review of literature and existing databases, and a field survey of the shoreline. No field survey was conducted of the offshore marshes, mudflats, and Bay waters. The recommended Additional Actions for Alternative 3 are not sufficient to support a thorough evaluation of alternatives in the EIR.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Sequoia Audubon Society	Environmental Organization	Hydrology and Water Quality; Biological Resources - Habitat	We have two major concerns regarding data gaps in the information included with the NOP. These data gaps should be addressed in the Environmental Impact Report (EIR): No information provided on the offshore barrier impact on water quality. Closure of the tidal gates for extended periods will affect the water quality within the lagoon. The information presented in the NOP and appendices are not sufficient to evaluate the viability of the tidal lagoon as wildlife habitat.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Hydrology and Water Quality), Permits
Sequoia Audubon Society	Environmental Organization	Existing Conditions	The Millbrae and Burlingame shoreline, tidal marsh and associated mudflats are an important and essential habitat for migratory and resident shorebirds and waterfowl. One hundred and sixty (160) species of birds have been recorded along this stretch of shoreline over the last decade.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Project Setting)
Sequoia Audubon Society	Environmental Organization	Process - Outreach	Qualified experts in estuarine biology and ornithology should be retained to perform a thorough biological resource assessment.	Pre-EIR (Outreach Plan)
Sequoia Audubon Society	Environmental Organization	Biological Resources - Birds; Biological Resources - Data Collection	Bird usage of the Millbrae and Burlingame shoreline and Bay waters peaks during fall migration, winter, and spring migration (September through April). Field surveys should be conducted seasonally and, most important, during this most diverse time of the year. The surveys should identify not only endangered and other listed species, but all bird species using this habitat and the resources they are dependent upon.	Pre-EIR (LEDPA), EIR (Biological Resources), Permits
Sequoia Audubon Society	Environmental Organization	Biological Resources - Data Collection; Construction Methods	The EIR should require a thorough baseline survey to determine where these species occur, should specify measures to protect them during project construction, and should include measures to mitigate damage to their habitat.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR (Biological Resources), Permits
Sequoia Audubon Society	Environmental Organization	Biological Resources - Habitat; Biological Resources - Ridgway's Rail; Existing Conditions	Ridgway's Rail – The Millbrae tidal marsh provides forage and shelter for the federally endangered and California Fully Protected Ridgway's Rail. Over the past 10 years, sightings of the rail have been reported on eBird at least once for every week of the year, indicating that they use the habitat year-round. A 2022 survey counted five rails in "fringe marshes" around SFO4.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Project Setting), Permits
Sequoia Audubon Society	Environmental Organization	Biological Resources - Habitat; Mitigations; Construction Methods	The EIR should address the impact of this alternative on these habitats and should specify mitigation measures to preserve the habitat during construction and after completion.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR (Biological Resources), Permits
Sequoia Audubon Society	Environmental Organization	Biological Resources - Habitat; Biological Resources - Ridgway's Rail; Existing Conditions	Northern Coastal Salt Marsh is primarily found at the Millbrae Bayfront Park and along the south side of San Francisco Airport. This habitat provides valuable refuge at both low and high tide for many bird species, and particularly for the Ridgway's Rail.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Project Setting), Permits

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Sequoia Audubon Society	Environmental Organization	Biological Resources - Habitat; Biological Resources - Shorebirds; Existing Conditions	Mudflats (Near Shore Sandy Bottom) are ecologically important ecosystems that support resident and migratory bird populations, as well as fish and benthic organisms. The importance of the mudflats to fish was addressed, but we do not see an analysis of the value to waterfowl and shorebirds. Mudflats are the primary source of food for waterfowl and shorebirds that spend the winter along the shores of San Francisco Bay.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Project Setting), Permits
Sequoia Audubon Society	Environmental Organization	Hydrology and Water Quality - Salinity	The impact of the barrier on physical and chemical processes and water quality parameters that impact estuarine ecology, including but not limited to those listed below, should be evaluated in the EIR: Salinity - Changes in salinity will occur with reduced tidal cycling, and with impoundment of stream flows and stormwater discharge. The EIR should evaluate the future range of salinity expected within the lagoon and the resulting impact on biological resources.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Sequoia Audubon Society	Environmental Organization	Hydrology and Water Quality - Anoxia	The impact of the barrier on physical and chemical processes and water quality parameters that impact estuarine ecology, including but not limited to those listed below, should be evaluated in the EIR: Stratification and anoxia - With extensive closure of the tidal gates, there will be less mixing, leading to likely formation of saltwater and freshwater layers in the lagoon and anoxic (low oxygen) conditions in the denser saltwater layer. An anoxic layer would negatively impact biological resources. It would also create favorable conditions for formation of toxic hydrogen sulfide, which would directly impact birds as well as creating noxious odors and a health hazard for nearby human populations.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Sequoia Audubon Society	Environmental Organization	Hydrology and Water Quality - Algal Blooms/Eutrophication	The impact of the barrier on physical and chemical processes and water quality parameters that impact estuarine ecology, including but not limited to those listed below, should be evaluated in the EIR: Eutrophication - Closure of tidal gates for extended periods will increase the temperature of the lagoon waters, particularly with higher ambient temperatures due to climate change. Nutrients from stormwater runoff and streamflow would receive less dilution from tidal mixing. Along with the higher temperatures, this will create favorable conditions for eutrophication. The result may be the death of fish and other aquatic organisms through lack of oxygen, and more frequent algal blooms that could harm birds and other wildlife as well as posing a health hazard to humans.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Sequoia Audubon Society	Environmental Organization	Hydrology and Water Quality - Sediment/Turbidity	The impact of the barrier on physical and chemical processes and water quality parameters that impact estuarine ecology, including but not limited to those listed below, should be evaluated in the EIR: Sedimentation - Closure of tidal gates will reduce currents in the enclosed area, leading to greater deposition within the lagoon of sediment from creek outflows, stormwater, and overland runoff. The EIR should evaluate the impact of sediment deposition on water quality, biological resources, and aesthetics. In addition, the EIR should evaluate the requirements to maintain the lagoon as a water body as it becomes shallower over time due to sedimentation.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Sequoia Audubon Society	Environmental Organization	Hydrology and Water Quality - Pollutants	The impact of the barrier on physical and chemical processes and water quality parameters that impact estuarine ecology, including but not limited to those listed below, should be evaluated in the EIR: Accumulation of pollutants - Closure of tidal gates for extended periods will reduce or eliminate dilution of pollutants within the lagoon. Pollutants are currently discharged into shore waters via stormwater discharge, overland runoff, and through tidal action on shallow groundwater beneath hazardous waste sites along the shoreline. Without tidal mixing, pollutants will be concentrated in the lagoon waters and sediments, may bioaccumulate or bioconcentrate in benthic organisms and fish, and have adverse impacts on birds and other wildlife that feed on those organisms.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Sequoia Audubon Society	Environmental Organization	Hydrology and Water Quality	The impact of the barrier on physical and chemical processes and water quality parameters that impact estuarine ecology, including but not limited to those listed below, should be evaluated in the EIR: Floating debris - Extreme rain events such as occurred in January 2023 produce large quantities of floating wood and other debris in creek outflows. Such storms are predicted to become more frequent with climate change. With reduced or absent tidal action, this debris is likely to settle to the lagoon floor and decompose, contributing to formation of an anoxic layer. The EIR should evaluate the impact of debris on water quality and biological resources within the lagoon.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Lack of Detail in NOP	However, we have been frustrated by a lack of clarity about what, specifically, is being proposed.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Stable Project Description	We diligently reviewed OneShoreline's supporting documents to improve our understanding of the Project. Unfortunately, we encountered inconsistencies in the documentation, with numbered alternatives not aligning across various reports. Similarly, the feasibility report drew from analyses in prior reports that did not consistently address the same Project concept or feature. Although we acknowledge the evolving nature of the Project, the lack of a definitive Project description forced us to make assumptions about the intended alternatives and hindered our ability to provide precise scoping comments regarding specific features or locations.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Lack of Detail in NOP	The NOP's summary of the proposed Project is ambiguous and lacks sufficient detail to provide adequate public transparency about what is proposed. As a consequence, the public cannot fully participate through informed, substantive comments on the appropriate scope of environmental review.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Stable Project Description	In order to ensure transparency and allow stakeholders to provide meaningful input into the Project concept and the scope of environmental review, we ask that OneShoreline rescind and reissue the NOP with a more complete Project concept, informed by outreach to stakeholders, regulators, and the public, that provides definitive descriptions of the Project alternatives and more specific detail about the features to be analyzed...	Pre-EIR (Updated Alternatives Feasibility Analysis)
Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Land Rights	In addition, please clarify ownership of the land and waters within the Project area and provide a parcel map displaying it graphically.	Pre-EIR (Updated Alternatives Feasibility Analysis)

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Sierra Club Loma Prieta Chapter	Environmental Organization	Nature-Based Solutions	Section 4.3 of the Project's Coastal Hazards report discusses "roughness" as a wave runup mitigating factor to consider in regard to sea level rise protection structures. ² However, the analysis does not consider employing natural or nature-based structures to provide that "roughness." San Francisco Estuary Institute's (SFEI) San Francisco Bay Shoreline Adaptation Atlas (Adaptation Atlas) ³ indicates high potential for nature based sea level rise adaptation strategies such as estuarine beaches, eelgrass beds, and mudflat augmentation in the Project Area.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Outreach; Nature-Based Solutions	We strongly recommend that you involve a science consultant, such as SFEI, taking a closer look at the adaptation opportunities for this shoreline.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Nature-Based Solutions; Alternatives Analysis - New Alternative	Please evaluate a shoreline alternative that incorporates nature-based solutions to the greatest extent practicable as part of the Project actions.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Land Use and Planning	The Project EIR should include the following plans and projects in its analysis of cumulative environmental impacts: Burlingame Landfill Long-Term Flood Protection Plan; San Francisco Airport Shoreline Protection Program; 250 Anza Boulevard (Top Golf); 567 Airport Boulevard (Office/R&D); 1669/1699 Bayshore Highway (Office/R&D); 1499 Bayshore Highway (Office/R&D); 1200-1340 Bayshore Highway (Office/Life Science); 620 Airport Boulevard (Office/R&D); 410 Airport Boulevard (public nature/recreation park and education center)	EIR (Land Use and Planning)
Sierra Club Loma Prieta Chapter	Environmental Organization	Air Quality	The EIR needs to analyze the impacts of each of the various potential pollutants and specify mitigation actions where needed. An inventory of criteria pollutants must be provided for both construction and maintenance activities of any on-shore or off-shore levee/barrier systems in order to compare alternatives. Pollutants to be addressed include the following, which are regulated due to their adverse health effects: ground level ozone, nitrogen oxides, particulate matter, carbon monoxide, sulfur oxides and lead.	EIR (Air Quality)
Sierra Club Loma Prieta Chapter	Environmental Organization	Air Quality	The EIR should also address toxic air contaminants (TAC), a broad class of compounds known to have adverse health effects. Diesel exhaust is the predominant TAC in urban air.	EIR (Air Quality)
Sierra Club Loma Prieta Chapter	Environmental Organization	Air Quality; Mitigations	Emission control strategies to reduce particulate emissions and nitrogen oxides must be identified and implemented in conjunction with the the Bay Area Air Quality Management District (BAAQMD) and the California Air Resources Board (CARB) guidelines which include both on-road and off-road equipment.	Pre-EIR, EIR (Air Quality), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Air Quality	Sensitive receptors to criteria pollutants and TACs must be identified and exposure estimated.	EIR (Air Quality)
Sierra Club Loma Prieta Chapter	Environmental Organization	Air Quality; Mitigations; Transportation	The impact of construction and maintenance activities on local roadways should be estimated with BAAQMD's Roadway Screening Analysis Calculator to assess whether there is increased cancer risk for nearby receptors. Construction and maintenance activities should follow the BAAQMD's best management practices to reduce particulate emissions especially PM2.5 and PM10 from equipment use and fugitive dust emissions. The use of electric equipment should be considered where practicable.	Pre-EIR (LEDPA), EIR (Air Quality, Transportation), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Air Quality	A greenhouse gas emissions inventory must also be performed for all construction and maintenance activities for shoreline and offshore levee/barrier systems in order to compare alternatives. Carbon dioxide and di-nitrogen oxide are byproducts of fossil fuel combustion including all gasoline-powered and diesel-fueled equipment and contribute to global warming.	EIR (Air Quality)
Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Insufficient Alternatives Analysis	Unfortunately, that [Biology Resources Constraints Analysis by Rincon Consultants], constrained by the Project's design, was narrow in scope, time, and content, basically limited to one terrestrial survey and literature studies. ⁸ The Conceptual Feasibility Report provided no estuarine studies or analysis of the lands that may lie inboard of a barrier wall. Nor did it address habitat-altering changes produced by an offshore barrier's change to water conditions inboard of a barrier.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR
Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Insufficient Alternatives Analysis	Key constraints of offshore barriers, particularly water quality, were identified, but inconsistently highlighted in the Rincon Report and not mentioned in the Conceptual Feasibility Report. Because the preferred alternative for this Project proposes an offshore barrier, such major omissions undermine the validity and credibility of the Project's Conceptual Feasibility decisions.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR
Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Insufficient Alternatives Analysis; Biological Resources - Habitat; Hydrology and Water Quality	Water quality was identified in the Rincon Report as a constraint for the offshore barrier alternative, but the report discusses only two potential positive impacts on biological resources: expansion of eelgrass habitats and an increase in filter-feeders. There is no discussion of the potential negative impacts of the alternative on water quality within the lagoon, which would have potentially major impacts on estuarine biota. This is a critical omission in the report. The EIR needs to include a detailed evaluation of the changes to the estuarine ecology that may occur with an offshore barrier.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Hydrology and Water Quality), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Insufficient Alternatives Analysis	Section 5.9 and Appendix I of the Conceptual Feasibility Report discuss an effort to model water circulation for two lagoon sizes and single or dispersed tidal gates. Creek inflows are not considered...Changes to circulation will also impact the ecology of creeks near the shoreline, even if those sites are excluded from the Project footprint.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR
Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality; Biological Resources	The EIR needs to collect current water quality data to establish a baseline for specific measures of water quality that will likely be impacted by changes to water circulation. Important parameters to measure include, but are not limited to, the following: Tidal and creek flows and velocities, Salinity and stratification, Turbidity, Sedimentation rates and patterns, and Temperature. The EIR should use the baseline data and the final alternatives designs to evaluate the impacts of circulation changes on water quality and the resulting impacts to biological resources. The evaluation should include scenarios that encompass the range of durations of tidal gate closures and the range of freshwater flows entering the lagoon.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Hydrology and Water Quality), Permits

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Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality - Under Multiple Scenarios	The evaluation should include scenarios that encompass the range of durations of tidal gate closures and the range of freshwater flows entering the lagoon.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality - Algal Blooms/Eutrophication	Enclosed water bodies with poor circulation are susceptible to stratification, anoxia and elevated water temperature; conditions commonly associated with fish kills, algal blooms and avian disease. Climate change is increasing these incidents as water temperatures rise...The EIR should analyze the potential for such outbreaks and their impact on biological resources.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality; Hazards and Hazardous Materials	Sources of pollutants from the Millbrae/Burlingame shoreline to the Bay waters include creek outflows, overland runoff, stormwater drains, groundwater discharge, shoreline erosion, and airborne dust. While managing pollution from these sources is not in the Project scope except during construction, reduced tidal flushing can lead to increased concentrations of contaminants in the lagoon water and sediment, and into the biota. For some contaminants, biomagnification up the food chain could result in levels dangerous to humans or wildlife consuming fish from the lagoon. Reduced tidal circulation may trap trash within the lagoon (e.g., balloons, netting, fishing line), harming waterfowl and marine mammals by entrapment or ingesting items. The EIR should evaluate the impact of increased pollutant concentrations and debris on biological resources.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality, Hazards and Hazardous Materials), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Insufficient Alternatives Analysis	The NOP and its related, published documents provide inadequate baseline data and analysis to inform scoping comments. By limiting analysis to isolated areas located on and along the shoreline, the Rincon Report artificially misrepresents the biological complexity of this interrelated ecosystem of riparian, shoreline, and estuarine habitats. Furthermore, the Rincon Report indicates that "[n]o biological impacts were evaluated for impacts during this analysis."9 As a result, the Conceptual Feasibility Study, which relies heavily on the Rincon Report, is severely inadequate.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR
Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Insufficient Alternatives Analysis; Alternatives Analysis - LEDPA	To be adequate for the Project, impact analysis in the EIR will require a complete and thorough biological assessment that addresses the topics below, does not depend on the limited scope of the Rincon Report, and includes all anticipated analysis needed to identify a Least Environmentally Damaging Practicable Alternative that will be accepted by regulators.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR
Sierra Club Loma Prieta Chapter	Environmental Organization	Biological Resources - Data Collection	The following additional data collection and evaluation efforts should be conducted for the EIR: Field survey locations - Surveys must be performed throughout the Project area to enable assessment of Project impacts on connected inland habitats that lie outside the Project footprint. Pending alternatives selected for EIR review, connected areas could include the Burlingame and Sanchez lagoons, lower creek habitats, and planned restoration sites (e.g., Sphere project, Peninsula Crossing project near Airport Boulevard), San Francisco Airport's shoreline marshes, Bay conditions outboard of a barrier wall and other sites.	Pre-EIR (LEDPA), EIR (Biological Resources), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Biological Resources - Data Collection	The following additional data collection and evaluation efforts should be conducted for the EIR: Field survey timing Whether onshore, offshore, or below Bay waters, wildlife presence and habitat use varies by season...Field surveys in any habitats within the Project footprint must be completed for each particular habitat type seasonally. Seasonal surveys will identify year-round residents, overwintering waterfowl and seasonal migrants like the wide range of shorebirds that are seen in the thousands on the mudflats and marshes, protected under the International Migratory Bird Act. Likewise underwater surveys, possibly performed from boats, will identify seasonal variation in fish species. These surveys need to include habitats outside the Project footprint, inland or in the Bay, that will be impacted by Project changes such as water quality conditions.	Pre-EIR (LEDPA), EIR (Biological Resources), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Biological Resources - Habitat	The Project needs to identify natural communities above and below the waterline. Natural community assessments will provide the monitoring baseline for potential impacts produced by implementation of the Project.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Existing Conditions	As bathymetric elevations vary substantially from west to east on the Bay's edge in the proposed footprint, the natural communities will vary. Shallow or slightly above still water level in the west supports the most extensive tidal marshes from Baylands Park and the fringe marsh along the SFO boundary to the north and west. Heading east and by Mills Creek, the slope of the Bay increases nearshore and doing so produces substantial mudflat edged by vestigial natural beach extending to the bend at Airport Blvd. East from there, the water deepens further, still water levels continuously reaching shore, sufficient to support shoreline fishing activity. In deeper waters, eelgrass beds exist and will require Project surveys to map and assess the health of its habitat. Inland, in creeks and lagoons that altered water conditions will impact, fringe marshes of varied types need to be identified and condition noted.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Project Setting)
Sierra Club Loma Prieta Chapter	Environmental Organization	Biological Resources - Data Collection; Biological Resources - Ridgway's Rail	...As Ridgway's rail is unique to the Bay and Northern California shoreline, the responsible agencies and science partners have the best data about this rail. Uniquely, SFO has Ridgway's rail monitoring data that is directly applicable to this Project's footprint. Further citizen science provides years of observations on this shoreline of the same bird. For local Special Status species data, we strongly recommend that the biological assessment include informally consulting with the wildlife agencies (US Fish & Wildlife Services, California Department of Fish & Wildlife, National Marine Fisheries Service), established science organizations (Point Blue Conservation Science, San Francisco Bay Bird Observatory), and citizen resources like E-Bird.	Pre-EIR (LEDPA), EIR (Biological Resources), Permits

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Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Insufficient Alternatives Analysis; Hydrology and Water Quality; Hazards and Hazardous Materials	Although the report properly evaluates constraints associated with disturbing contaminated soils and sediments during construction, there is no discussion of the impacts of the alternatives on the Bay environment, recreation, and public health. The EIR needs to evaluate how each alternative will impact releases of hazardous chemicals from shoreline sites to groundwater and to the Bay. In particular, construction of an offshore barrier with tidal gates will have the effect of reducing tidal flushing, potentially leading to increases in the concentration of pollutants in the lagoon water and sediment. The EIR should evaluate the environmental fate and transport of contaminants entering the lagoon from stormwater, creek flows, overland runoff, and the tidal action of rising groundwater on shoreline hazardous material sites and the Burlingame landfill. The evaluation should address the potential for the chemicals to <u>bioconcentrate or bioaccumulate in benthic organisms, fish, birds and mammals using the lagoon.</u>	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality, Hazards and Hazardous Materials), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Hazards and Hazardous Materials	Known sites with hazardous chemicals that may be of concern due to their proximity to the Bayshore (located between Highway 101 and the Bay) include but are not limited to the following: Burlingame landfill - As discussed in the Hazardous Materials Constraints Analysis report, monitoring wells at this closed landfill have been reported to contain low levels of PFAS. A tentative order from the California Water Board11 would expand the water quality monitoring requirements for this site and require additional protective measures for borings or pile driving through the cap into the <u>underlying groundwater. The EIR should evaluate the impact of this order on each proposed alternative.</u>	EIR (Hazards and Hazardous Materials)
Sierra Club Loma Prieta Chapter	Environmental Organization	Hazards and Hazardous Materials	Known sites with hazardous chemicals that may be of concern due to their proximity to the Bayshore (located between Highway 101 and the Bay) include but are not limited to the following: Northern corner of Airport Boulevard and Old Bayshore Highway - Elevated concentrations of gasoline-related contaminants (e.g., benzene, MTBE) were present in shallow groundwater at this location the last time the site was sampled, in 2010.12 Although this site is listed as closed in Geotracker, there may still be contaminants present at levels that could be of concern for migration to the Bay.	EIR (Hazards and Hazardous Materials)
Sierra Club Loma Prieta Chapter	Environmental Organization	Hazards and Hazardous Materials	Known sites with hazardous chemicals that may be of concern due to their proximity to the Bayshore (located between Highway 101 and the Bay) include but are not limited to the following: 370 Lang Road - Two closed sites are listed in Geotracker at this location. The monitoring wells were last sampled in 201013 and at that time contained gasoline-related contaminants above cleanup levels. These sites are not listed in the Hazardous Materials Constraints Analysis report, which should extend the site lists and map to the southern end of the Project area.	EIR (Hazards and Hazardous Materials)
Sierra Club Loma Prieta Chapter	Environmental Organization	Hazards and Hazardous Materials; Hydrology and Water Quality - Shallow Groundwater Rise	Depending on the alternative selected, it may be necessary to evaluate sites further inland that are expected to be impacted by rising groundwater. There are several leaking underground storage tank (LUST) sites landward of Highway 101 that have very high levels of gasoline-related contaminants in the shallow groundwater.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality, Hazards and Hazardous Materials), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality; Hazards and Hazardous Materials	The Burlingame and Millbrae Wastewater Treatment facilities emergency outfalls enter San Francisco Bay within the Project location. In October 2021, the Burlingame facility discharged 865,000 gallons of fully treated wastewater to the Bay that could not be accommodated in the North Bayside System Unit pipeline. The plant also lost power and experienced a failure of the stormwater pumping system. Release of untreated wastewater, which could occur with an extended outage or equipment failure, would pose hazards to human health and the environment. The EIR should <u>evaluate how the project alternatives would accommodate emergency response in this type of emergency.</u>	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality, Hazards and Hazardous Materials), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Insufficient Alternatives Analysis	The Rincon report and Feasibility Study fail to consider likely impacts of the offshore barrier alternative on lagoon water quality.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR
Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality - Salinity	Changes in salinity will occur with reduced tidal cycling and with impoundment of stream flows and stormwater discharge. The EIR should evaluate the future range of salinity expected within the lagoon and the resulting impact on biological resources.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality - Anoxia	With extensive closure of the tidal gates, there will be less mixing, leading to likely formation of saltwater and freshwater layers in the lagoon and anoxic or low oxygen conditions in the denser salt water layer. An anoxic layer would negatively impact biological resources. It would also create favorable conditions for formation of toxic hydrogen sulfide, which would directly impact fish and birds as well as creating noxious odors and a potential health hazard for nearby human populations.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality - Algal Blooms/Eutrophication	Closure of tidal gates for extended periods will increase the temperature of the lagoon waters, particularly with higher ambient temperatures due to climate change. Nutrients from stormwater runoff and streamflows would receive less dilution from tidal flushing. Along with the higher temperatures, this will create favorable conditions for eutrophication. The result would be the death of fish and other aquatic organisms through lack of oxygen, and more frequent algal blooms that could harm fish, birds and other wildlife, as well as posing a health hazard to humans.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality - Sediment/Turbidity	Closure of tidal gates will reduce currents in the enclosed area, leading to greater deposition within the lagoon of sediment from creek outflows, stormwater, and overland runoff. The EIR should evaluate the impact of sediment deposition on water quality, biological resources, and aesthetics. In addition, the EIR should evaluate the <u>requirements to maintain the lagoon as a water body as it becomes shallower over time due to sedimentation.</u>	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits

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Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality - Pollutants	Closure of tidal gates for extended periods will reduce or eliminate dilution of pollutants within the lagoon. Pollutants are currently discharged into shore waters via stormwater discharge, overland runoff, and through tidal action and outflow of shallow groundwater beneath hazardous material sites along the shoreline. Contaminants of emerging concern (CECs), including pharmaceuticals and personal care products (PPCPs), are increasingly being detected at low levels in surface water, and there is scientific evidence and growing concern that these compounds may have an impact on aquatic life. ¹⁵ Without tidal flushing, pollutants will be concentrated in the lagoon waters and sediments, may bioaccumulate or bioconcentrate in benthic organisms and fish, and have adverse impacts on birds and other wildlife that feed on those organisms.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality	Extreme rain events such as occurred in January 2023 produce large quantities of floating wood and other debris in creek outflows. Such storms are predicted to become more frequent with climate change. With reduced or absent tidal action, this debris is likely to settle to the lagoon floor and decompose, contributing to formation of an anoxic layer. Manmade trash such as plastic bags and food containers will also enter the lagoon with creek flows. The EIR should evaluate the impact of natural and man-made debris on water quality and biological resources within the lagoon, as well as impacts on the operation of the tidal gates.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Hydrology and Water Quality), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Process - Insufficient Alternatives Analysis	The NOP and supporting documents fail to consider the impact of future groundwater rise on the feasibility of the onshore barrier alternative and the impact of rising groundwater on land use and biological resources within the Project footprint.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR
Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality - Shallow Groundwater Rise	The EIR should address the impacts of groundwater flooding for the onshore barrier alternative, as pumping may be required to remove the water.	Pre-EIR (Updated Alternatives Feasibility Analysis), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality - Shallow Groundwater Rise	Rising groundwater can also mobilize contaminants in soils containing hazardous materials, carrying the contaminants to the ground surface or, by groundwater flow, creek flow, and tidal action, into the Bay. Combined with lagoon effects from an offshore barrier, contamination via rising groundwater could exacerbate a range of impacts on water quality (see above). The EIR should evaluate whether Project alternatives will modify the extent of these impacts to land use and to onshore and offshore biological resources.	Pre-EIR (Updated Alternatives Feasibility Analysis), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Hydrology and Water Quality - Shallow Groundwater Rise	Given the complexity of the Project area shoreline geometry, currents and tides, and the patchwork of sand, bay mud and artificial fill that comprises the shoreline, it is critical that the EIR evaluate the impact of each selected alternative on depths to groundwater along the shoreline, and the resulting effects on public health, biological resources, recreation (e.g., fishing), and public infrastructure.	Pre-EIR (Updated Alternatives Feasibility Analysis), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Nature-Based Solutions; Alternatives Analysis - New Alternative	As noted in the Project Alternatives section, above, the EIR should consider a shoreline alternative that incorporates nature-based solutions to the greatest extent practicable.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), Permits
Sierra Club Loma Prieta Chapter	Environmental Organization	Alternatives Analysis - New Alternative; Alternatives Analysis - Adaptation Pathways; Land Use and Planning	We urge you to consider an Adaptation Pathways approach for such an alternative that allows for flexibility, staggered investment, and feedback and engagement mechanisms to inform whether to adjust strategy to take advantage of or respond to new conditions.	Pre-EIR (Updated Alternatives Feasibility Analysis)
Sierra Club Loma Prieta Chapter	Environmental Organization	Land Use and Planning	Potential growth inducing effects of the Project should be examined through EIR analysis of the following questions: Would the Project remove obstacles to growth through the construction of these major infrastructure facilities that do not presently exist in the Project area, or through possible changes in existing regulations pertaining to land development? Would this Project result in the need to expand public utilities or services to maintain desired levels of service for the induced growth? Would this Project foster population growth (e.g., construction of additional housing), either directly or indirectly through job growth? Would this Project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?	EIR (Land Use and Planning)
Sierra Club Loma Prieta Chapter	Environmental Organization	Recreation - Offshore Trail	The EIR should analyze the impacts of newly introducing the variety and volume of Bay Trail users (and any artificial lighting of the facility) to Bay habitat that currently has little exposure to human activity.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation)
Sierra Club Loma Prieta Chapter	Environmental Organization	Recreation - Offshore Trail	The proposal to construct a trail atop a 2.65-mile barrier raises critical questions regarding ownership, upkeep, and user safety. As the San Francisco Bay Trail typically does not own the trails designated as "Bay Trail," clarity is needed on ownership, responsibility for maintenance, and jurisdiction for emergency response. The EIR should analyze potential scenarios, such as medical emergencies away from the shoreline, and identify solutions to ensure public safety. Additionally, it must address legal liabilities if emergency response is hindered due to trail design constraints.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation)
Sierra Club Loma Prieta Chapter	Environmental Organization	Recreation - Fishing; Equity/Environmental Justice	The EIR should comprehensively assess the impact on fishing conditions, including changes to easy access and the socio-economic demographics of the fishing community. It is crucial to ensure that the proposed project does not adversely affect the equality of access to free recreational opportunities.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), EIR (Recreation), NEPA (Environmental Justice), 60% Design
Sierra Club Loma Prieta Chapter	Environmental Organization	Recreation - Windsports	The Project area is a popular destination for wind- and sail-board enthusiasts. The EIR should evaluate the impact of an offshore barrier on water sport access to the Bay as well as changes to wind patterns, water conditions, and safety implications for recreational users.	Pre-EIR (Updated Alternatives Feasibility Analysis), EIR (Recreation)
SPHERE Institute	Property Owner	Project Need	The SPHERE Institute appreciates the importance of sea-level rise protection and has been working with the OneShoreline team to ensure that the design of our Bay Rise Park project at 410 Airport Boulevard in Burlingame is coordinated with OneShoreline's long-term plans for the region.	Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), EIR

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SPHERE Institute	Property Owner	Biological Resources - Habitat; Recreation - Windsports	...certain fundamental park amenities could be affected by the Project's proposed offshore Lagoon Barrier, in particular the restored tidal marsh habitat and water access points for boardsailing and human-powered boatcraft.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources, Recreation), Permits
SPHERE Institute	Property Owner	Process - Outreach; Recreation - Windsports	We encourage you to engage with our team and the local boardsailing and human-powered boatcraft community groups to ensure the final design provides optimal access for these activities from the park's access points.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis), EIR (Recreation)
SPHERE Institute	Property Owner	Process - Outreach; Biological Resources - Habitat	We also hope to continue coordination between OneShoreline and Bay Rise Park's team of engineers, biologists, and designers to ensure the Project will not negatively affect the long-term viability of the park's tidal marsh habitat.	Pre-EIR (Outreach Plan, Updated Alternatives Feasibility Analysis, LEDPA), EIR (Biological Resources), Permits
Stephen Hiley	Individual	Tie-In Location - Coyote Point; Recreation - Windsports	I'm writing to express my concern with the proposed project to build a lagoon barrier outside Coyote Point Regional Park. As a lifelong windsurfer and now wing foiler, I value the access we have there. There are so few spots with bay access. I strongly oppose this project. This project violates the many bay access protections in place and will bring legal challenges from all quarters. I hope your organization can find other measures that do not impact our access.	30% Design, Pre-EIR (Updated Alternatives Feasibility Analysis, Outreach Plan), 60% Design, EIR (Recreation)
Steyn Lodewyk	Individual	Nature-Based Solutions	I feel that this is an unnatural solution that will change the character and the ecosystem of the bay...Please propose more natural solutions that do not change the character of the bay. We can explore unnatural solutions in the areas that have already been developed.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), Permits
Steyn Lodewyk	Individual	Monitoring and O&M; Cost/Economic Impacts	The tide gate concepts will also require constant monitoring and maintenance and the proposed solution will be a tax burden on the community for years to come.	Pre-EIR (Updated Alternatives Feasibility Analysis, LEDPA), 60% Design, EIR, Permits