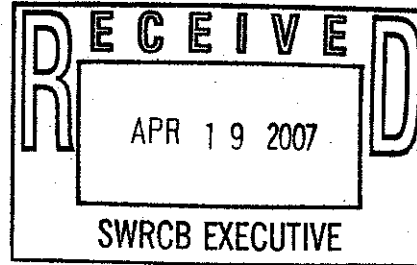




San Francisco International Airport



P.O. Box 8097  
San Francisco, CA 94128  
Tel 650.821.5000  
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www.flysfo.com

April 19, 2007

**Wetland/Riparian Policy**  
Deadline: 4/19/07 12 noon

State Water Resources Control Board  
Song Her, Clerk of the Board, Executive Office  
P.O. Box 100  
Sacramento, CA 95812-0100

AIRPORT  
COMMISSION  
CITY AND COUNTY  
OF SAN FRANCISCO

**Subject: *Comment Letter – Proposed Wetland and Riparian Area Protection Policy***

GAVIN NEWSOM  
MAYOR

Dear Ms. Song Her,

LARRY MAZZOLA  
PRESIDENT

On behalf of San Francisco International Airport (SFO), thank you for the opportunity to provide CEQA scoping comments on the proposed Wetland and Riparian Area Protection Policy prepared by the State Water Resources Control Board. Since the Policy is not yet drafted or made available to the public for review, SFO's scoping comments are general in nature. SFO is interested in participating in further CEQA review, as well as the development of the State Water Resource Control Board's proposed Wetland and Riparian Area Protection Policy.

LINDA S. CRAYTON  
VICE PRESIDENT

CARYL ITO

ELEANOR JOHNS

RICHARD J. GUGGENHIME

SFO, situated on San Francisco Bay, has wetland features. These wetland features raise safety concerns for our air operations because they attract wildlife, birds in particular, which pose hazards for departing and arriving aircraft. Bird strikes can cause damage and, in the extreme, may result in loss of life. For safety reasons, Federal Aviation Administration (FAA) regulations discourage the location of wetlands near airports.

JOHN L. MARTIN  
AIRPORT DIRECTOR

In considering the environmental effects of the proposed changes to existing State wetland and riparian protection policies, the CEQA environmental evaluation should include an analysis of the proposed Wetlands and Riparian Policy's effects on airport safety, especially as they relate to non-federally protected wetlands located in close proximity to runways, and incorporate appropriate airport exemptions. In addition, the environmental review should analyze the consistency and conformity of the Policy with other regulations governing wildlife around airports, including but not limited to FAA regulations and policies for wetlands and wildlife near airports.

Ms. Song Her  
April 19, 2007  
Page 2 of 2

Moreover, the environmental review should analyze the effect of the Policy on an airport's ability to grow and to accommodate air passenger needs. Air travel demand, which is closely tied to economic growth, will continue to increase statewide. In some cases, airport development, will impact wetlands and require wetland mitigation. Current federal and State regulatory permitting places higher value on wetland mitigation creation sites closer to the fill or discharge location. As the informational document for the proposed policy suggests, higher value water quality functions may be gained if regionwide water quality functions are given greater consideration. Therefore, the CEQA environmental evaluation should also analyze the proposed policy's effect on regionwide water quality functions as it relates to mitigation site selection.

We appreciate the opportunity to participate in the scoping of the environmental issues under CEQA relating to the development of a proposed Wetland and Riparian Area Protection Policy. We reserve our right to comment further as the actual Wetland and Riparian Area Protection Policy is drafted.

Please keep Nixon Lam, Senior Environmental Planner, of my staff informed as the Board proceeds with the preparation of the CEQA document. Mr. Lam may be contacted at (650) 821-5347 or at [Nixon.Lam@flysfo.com](mailto:Nixon.Lam@flysfo.com).

Sincerely,



Danielle J. Rinsler, AICP  
Planning Director

cc: John L. Martin  
Jackson Wong  
Cathy Widener  
Melba Yee  
Nixon Lam