



March 31, 2011

Redwood City Planning, Housing
and Economic Development Department
Attn: Blake Lyon, Senior Planner
Saltworks Project Scoping Comments
1017 Middlefield Road
Redwood City, CA 94063
BLyon@redwoodcity.org

RE: Saltworks Project, Notice of Preparation of an Environmental Impact Report
October 7, 2010

Dear Mr. Lyon:

Thank you for the opportunity to respond and comment on the Notice of Preparation of an Environmental Impact Report for the Saltworks Project (NOP) issued on October 7, 2010. Our comments are being submitted jointly with the Citizens Committee to Complete the Refuge. The City's Notice of Preparation and Initial Study documents that the proposed Saltworks Project could result in "potentially significant impacts" in all 18 environmental issue areas analyzed under CEQA.

According to the Notice of Preparation, the development application from DMB Redwood City Saltworks, LLC for a mixed-use project located on 1,436 acres of Cargill salt ponds south of Seaport Boulevard does not include a complete project description. The NOP states that "additional information is needed to complete the project description", and that a second NOP will be circulated in 2011 that will have a complete project description and a preliminary list of alternatives.

For this reason, we are submitting comments that are general in nature at this time. Our comments on the existing environmental conditions at the Saltworks Project site have been submitted in a separate letter. We will submit more detailed scoping comments in response to the second NOP when the City provides a complete Saltworks Project description. Our comments that follow are categorized according to the checklist in the State CEQA Guidelines.

Transportation and Traffic

The Saltworks Project would generate 60,000 to 70,000 daily vehicle trips according to the City's *Preliminary Analysis of Transportation and Circulation* report (January 2010).

To accommodate these vehicle trips, the primary element of the "vehicular transportation plan" for the Project is **a new four-lane roadway parallel to Highway 101 with three major connections at Marsh Road, Woodside Road and Whipple Avenue**. The NOP identifies a number of issues related to this proposed roadway that are considered "potentially significant":

- 1) The parallel roadway and the three connections "have significant challenges related to required property acquisition, maintenance of access to adjacent properties, and integration with the existing roadway network". If any of these major connections is found to be infeasible, the Project would not be able to be developed as proposed".
- 2) "The existing interchanges on Highway 101 are operating near or at capacity and the freeway is currently at capacity near the Project site." Traffic will "increase on Highway 101 and at the three major regional connections at Marsh Road, Woodside Road and Whipple Avenue."
- 3) According to the City's General Plan, "both the Woodside Road and Whipple Avenue corridors are operating at Level Of Service E between El Camino Real and Highway 101. Since these key corridors are currently operating at capacity or over capacity, they do not currently have excess capacity to absorb Project traffic".
- 4) "Roadway capacity constraints may affect emergency access to and from the site." Specifically, roadway constraints "could affect emergency vehicles traveling to and from medical facilities located west of the US 101 corridor."

The complete project description in the second NOP should identify where the roadway would be placed and the specific properties that would be impacted by eminent domain and poor street access.

The EIR should determine the Project traffic impacts to Highway 101, the Woodside Road, Marsh Road and Whipple Avenue connectors and corridors, and traffic impacts to all other local streets and roadways. Increased traffic from trucks transporting fill and associated surface damage to local streets and roads should also be analyzed. The cumulative impacts analysis in the EIR must factor in the daily vehicle trips Redwood City will already be absorbing from new development outlined in the General Plan, in addition to the 60,000-70,000 vehicle trips from the Saltworks Project.

Mitigation measures proposed for Project traffic must also be examined closely in the EIR. The NOP states that the scale of the Project's proposed transit system is "different from the current General Plan" and there are questions related to "ridership, design of the system, phasing and funding". Additionally, the Saltworks Project will construct a transit system only up to the edge of the site. If the City cannot secure funding for the transit system leading to the site, it won't be built. Only existing public transit systems, or systems for which funding has been secured, should be considered when the EIR evaluates transit as a mitigation for Project generated traffic.

Utilities and Service Systems

Water Supply

"The Project would generate an increase in demand for water supply that is not anticipated to be fully met by the City's existing and future water supplies." The NOP describes the Project's plan for addressing the water supply shortfall as follows:

"The Project would utilize a transfer of Nickel Family water from the Kern County Water Agency to Redwood City. The Project applicant owns rights to the Nickel water for 35 years and has an option to extend this right for an additional 35 years. **After the applicant's right to the Nickel water expires, the source of the potable water for the project is unknown; except that the Project includes the option of purchasing supplemental water supplies from Redwood City.**"

The current project description fails to provide adequate information on the source of drinking water for the Saltworks Project required for an EIR analysis. The actual source of water after 2078 must be included in the project description for the second NOP. Since the proposed water transfer involves Nickel Family water from the Delta, what would happen to Redwood City if the Nickel water is reduced or eliminated in a severe statewide drought, or as a result of legal challenges to the water rights DMB purchased?

The NOP further states: **"The transfer of this water to Redwood City requires participation of at least two intermediary agencies and approval of other public agencies and may require infrastructure improvements necessary to facilitate the transfer."** The specific intermediary agencies required for the transfer of the Nickel water from the Delta should be disclosed in the complete project description for the second NOP.

Water supply for the Saltworks Project is a key issue that could have immediate and long-term impacts on current Redwood City residents, other SFPUC service areas and the region. The EIR should include a robust analysis of the feasibility and environmental consequences of the Project water supply plan and the following questions should be answered:

- 1) What are the impacts to implementation of the Redwood City new General Plan if the City makes long-term commitments of water to the Saltworks Project?
- 2) What are the environmental impacts from transferring agricultural water rights for urban uses, and from removing more water from the Delta?
- 3) What are the environmental and economic risks to Redwood City residents of having a portion of their water supply privatized and owned by a for-profit corporation?

Wastewater Treatment

Redwood City residents have been paying for improvements to the South Bay System Authority (SBSA) wastewater treatment facility for a number of years through increases in the monthly sewer service charge; therefore, impacts to the SBSA from the Saltworks Project are critically important to existing ratepayers.

The NOP states that the Saltworks Project was not included in the planning for SBSA's current Capital Improvement Project, "**and may generate a demand for wastewater treatment that exceeds the capacity of the existing SBSA treatment facility**". Additionally, the Project proposes to use recycled water for a number of uses and "**sufficient recycled water may not be available from Redwood City or SBSA**".

To address these issues, several options are outlined for Project wastewater treatment. The second NOP must clearly delineate the wastewater treatment option that will be utilized for the Saltworks Project, so that an adequate EIR analysis can be conducted. The EIR should identify any impacts to the implementation of the new General Plan if sewage treatment capacity at the SBSA is committed to the Project. Additionally, impacts of the Project on the availability of recycled water to current users and the City's planned recycled water delivery areas should be analyzed.

Land Use and Planning

The NOP states that the Saltworks Project could "**redirect growth from the City's downtown to the project site, potentially affecting implementation of the Precise Plan for Redwood City's downtown core area**". Additionally, the proposed land use and zoning required for the Saltworks Project would be inconsistent with the City's current General Plan land use designation of "Open Space", and with the site's current "Tidal Plain" zoning.

The EIR should analyze impacts the Saltworks Project would have on implementation of the City's entire New General Plan, not just the Downtown Precise Plan.

According to the NOP, "**The Seaport Industrial Association has expressed concern about the compatibility of the Project with adjacent Port and other industrial uses; the Association indicates that additional restrictions related to noise, dust, and night-lighting could potentially affect the viability of existing Port and other industrial uses adjacent to the Project site**". This impact is considered potentially significant in the NOP.

The EIR should analyze impacts to regional shipping, the construction trades industry, the recycling industry, regional traffic and regional air quality from increased truck emissions if the Port and port-related industries are restricted or shut down.

Population and Housing

According to the NOP, **the Saltworks Project would result in an increase in population of approximately 32,040 people, or 30% over current levels.** The anticipated population increase from implementation of the Redwood City new General Plan is 16,300. Together, the population of Redwood City would increase from 76,100 to 124,400, or 63%.

"Development of the Project could also increase pressure to redevelop surrounding properties, including the mobile home parks, resulting in potential impacts to existing housing and the people living in those units".

The complete project description provided in the second NOP should include a breakdown of the actual number of very low and low-income housing units that will be built, and information on whether the low cost of these housing units is guaranteed for the life of the Project. The EIR should compare the potential gain from the Project of very low and low-income housing units, with the potential loss of the housing units in the mobile home park neighborhood.

Housing affordability is a key issue for this project. As discussed below under Greenhouse Gas Emissions, DMB's assertion that the Project addresses climate change because people will no longer be commuting long distances must be "fact checked" against the reality of whether current long distance commuters can actually afford the housing DMB proposes to build.

Any alternatives analysis in the EIR involving housing should consider the 9,103 new housing units included in the City's recently adopted General Plan. The new transit-oriented housing slated for Downtown and the El Camino Real and Woodside Road corridors will utilize existing infrastructure and provide economic benefits to the City core. Construction of this housing will not impact open space and wildlife, or create serious quality of life issues for Redwood City residents.

Public Services

Up to 39 new police officers would be required to serve the Saltworks Project, and additional demands would be placed on Fire Department staffing and equipment - all impacts that the NOP considers "potentially significant". How will the City finance these services? If funding is inadequate, what effects will this demand for increased public safety services have on response times in the rest of the City?

The Project includes land for four new elementary schools and one middle school. The NOP states: **"The acreage set aside for schools may not be sufficient to support the proposed project. In addition, the project may result in adverse impacts to existing high schools."** These impacts must be analyzed in the EIR.

The EIR should also analyze the impact to existing schools. If the Redwood City Elementary School District doesn't have the resources to staff and supply the five new schools in the Project, will the District have the capacity to absorb the new students?

Recreation

"Increased use of existing recreational facilities by Project residents and employees may cause further and accelerated physical deterioration of facilities." The NOP states that this impact is considered potentially significant.

The EIR should identify the specific City facilities and parklands that would be impacted, as well as nearby County parks, City of Menlo Park facilities, USFWS Refuge trails, and Midpeninsula Regional Open Space District preserves. The EIR analysis should determine how, and to what degree, these recreational facilities would deteriorate from increased use by the 32,040 Saltworks Project residents.

At the Natural Resources Scoping Session, DMB representatives advised residents that the internal waterways in the development plan will no longer be recreational, and that "no human contact" would be allowed in these stormwater drainages. The complete Project description in the second NOP must reflect the removal of the waterways from the active recreation acreage total. Additionally, the Project description should provide a breakdown of the specific acreage in each of the following Project "active recreation" components: perimeter flood control levee, greenways, community/neighborhood park facilities and playing fields.

Air Quality

The NOP identifies numerous potentially significant air quality impacts from the Saltworks Project, including increased ozone and particulate matter from grading, construction equipment and project cars, buses and trucks. Additionally, placement of sports fields and schools near east Bayshore Road and Highway 101, and residential development along Seaport Boulevard near the Port and other industries **may expose sensitive receptors to substantial air pollutant concentrations.**

The project description/application contains no information on the amount or source of fill required for the development site and construction of the perimeter levee, or how fill material will be transported to the site. A recent EIR completed for a proposed development project in Newark requiring 2.1 million cubic yards of fill estimated that 100 truckloads of material would be imported per day for one to two years. Clearly, importation of the fill for this scale of a project can have significant air quality impacts.

A "complete project description" for the second NOP must include the source and amount of off-site fill material needed for the project, the means of conveyance to the site, the number and routes of truck, train, or barge trips to and from the site, and the number of years that fill will be moving to the site and grading will be taking place. This information is critical because the project EIR must analyze impacts from transporting fill and grading to the air quality and public health of Redwood City residents and workers, as well as to the region as a whole.

Biological Resources

It is well documented that salt ponds are extremely important for shorebirds and other migratory waterfowl, and the proposed Saltworks Project would develop 1,000 acres of ponds currently used as habitat. The NOP documents potentially significant impacts in all six of the subcategories related to biological resources in the State CEQA Guidelines, including substantial adverse impacts to threatened and endangered species, a sensitive natural community, federally protected wetlands, and wildlife corridors and nursery sites.

In a separate letter, Friends of Redwood City and the Citizens Committee to Complete the Refuge provided extensive comments on the current environmental conditions at the Saltworks Project site, existing habitat values and the importance of this site to regional Bay ecosystem goals.

DMB representatives stated at the Natural Resources Scoping Meeting that the work on restoration would be initiated in phases over 30 years, just like the development. The project description for the second NOP should include details on how many acres of fully vegetated tidal marsh will actually be restored, how restoration will be phased with the development, and when the tidal marsh restoration will be completed.

Geology and Soils

The NOP states that **regional liquefaction hazard mapping indicates that a major rupture on the San Andreas Fault could result in moderate to high liquefaction at the Saltworks Project site.** Contradictory to this, DMB representatives at the Natural Resources Scoping Meeting were advising residents of Redwood City that there is no risk of liquefaction at this site. Clearly, the EIR for the project must provide documentation from a reliable source, such as USGS, as to whether this significant geological hazard could occur.

Other geological hazards identified in the NOP for the Project site include:

- The presence of a potentially active earthquake fault crossing the site;
- Susceptibility to very strong to violent seismic shaking from an earthquake on the San Andreas Fault;
- Lateral spreading and sloughing of the Project's perimeter levee from strong seismic ground shaking;
- Differential settlement, subsidence, expansive soils and erosion.

Since the Saltworks Project will be placing over 30,000 residents behind a 13-foot tall perimeter flood protection levee, there should be an extensive analysis in the EIR of the risks and consequences of a levee failure in the event of a major earthquake. The analysis should take into account any increased risks to people and property that might occur from levee failure when sea level is higher. Hazards from susceptibility to strong or violent seismic shaking from an earthquake on the Hayward Fault should also be analyzed in the EIR.

Greenhouse Gas Emissions

The NOP states that the Project would generate greenhouse gas (GHG) emissions, both directly and indirectly, that may have a significant impact on the environment and exceed the state-mandated thresholds. The sources for the emissions listed in the NOP do not include GHG emissions from the transport of fill or from construction equipment and vehicles over the course of the 20-30 year buildout. The EIR for the Project should include these GHG emission sources in the analysis. The EIR should also look at consistency with the City's Climate Action Plan, which is posted on the City's website.

According to the NOP, the Project "has the potential to reduce regional GHG emissions by providing housing in close proximity to transit facilities and major employment centers on the Peninsula, thus reducing the vehicle miles traveled for commuting." The validity of this claim by the Project applicant will be analyzed, since the NOP states "The EIR will investigate this issue further". The analysis of this issue in the EIR must take the following factors into account:

- Commuters from outlying areas must be able to afford the housing. According to the NOP, only 15% of the Project dwelling units will be offered at below market rate. The EIR should provide the median income and housing prices for outlying areas like San Joaquin County, and the projected housing prices in the Project, to determine how many long distance commuters would actually be taken off the road when analyzing GHG emissions.

- With a 20-30 year buildout, commuters may be driving extremely low or zero emission vehicles by the time the project is fully constructed. The biggest problem in the future may not be vehicle emissions, but rather sequestering carbon dioxide. If additional acres of salt ponds were restored to tidal marsh instead of being developed, the marsh would sequester carbon dioxide, a greenhouse gas, well into the future, helping Redwood City meet GHG reduction targets.

- The 1 million sq.ft. of office space in the Project will be a magnet for bringing more commute vehicles into Redwood City, generating 11,000 daily vehicle trips and increasing GHG emissions. The presumption by the project applicant that residents at the Saltworks Project site will be a high percentage of the employees in this office space needs to be validated. Current residents of Redwood City work at various locations throughout the Bay Area.

Additionally, the Saltworks Project will construct a transit system only up to the edge of the site. If the City cannot secure funding for the transit system leading to the site, it won't be built. Only existing public transit systems, or systems for which funding has been secured, should be considered when the EIR evaluates transit as a mitigation for Project GHG emissions.

Noise

The NOP states that **noise and vibration from construction of the Project, including use of pile drivers, is expected to continue for 20 to 30 years,** and these impacts could be significant

for "adjacent mobile home park residents and for residents and workers in the vicinity of the Stanford University Medical Clinic".

The EIR should also analyze noise impacts from pile drivers and other construction equipment to the workers at Pacific Shores Center, in businesses along Seaport Blvd. and all nearby residential neighborhoods and businesses located west of Highway 101.

Hydrology and Water Quality

The Saltworks Project site is surrounded by sensitive aquatic and tidal marsh habitats that could be adversely affected by construction activities and stormwater runoff. The NOP includes the following "potentially significant impacts":

1) Construction activities, including grading and fill, may be a source of excess sedimentation and "chemical contamination from use of alkaline construction materials (concrete, mortar, hydrated lime) and hazardous or toxic materials such as fuels and paints".

2) "After construction, on-site stormwater runoff would discharge to an internal waterway, which would then discharge to the Bay. Stormwater runoff may pick up debris, chemicals, dirt, and other pollutants and carry them into the Bay." Stormflows would also discharge recycled water from the internal waterways into the Bay as well.

The complete project description in the second NOP should provide information on the projected volumes, time periods and frequency of discharges to the Bay from the internal waterways. The EIR should profile the chemicals and other pollutants expected in the internal waterways such as, but not limited to, landscape and structural pesticides, algaecides, and biological contaminants and pharmaceuticals from the recycled water. The EIR should analyze the possible effects of pollutants being concentrated in the internal waterways prior to discharge into adjacent sloughs and tidal channels.

The Project would also **"Place housing and structures within a 100-year flood zone", at risk from flooding "as a result of the failure of a levee"**. The NOP states that the Project would "expose people or structures to a significant risk of loss, injury or death involving flooding". The EIR should provide actual scenarios of a levee failure including the potential environmental, public safety and economic consequences.

Agricultural Resources

The NOP suggests that the Saltworks Project site is currently under a California Land Conservation Act (Williamson Act) contract due to agricultural values rather than for the conservation of open space. In fact, the contract has allowed Cargill, Inc. to pay a greatly reduced property tax rate since 1979, in exchange for not converting the salt ponds to non-open space uses.

The second NOP and EIR should identify the actual purpose of the contract as conserving open space. Under the Williamson Act, "open space" is defined as:

"The use and maintenance of land in a manner that preserves its natural characteristics, beauty, or openness for the benefit and enjoyment of the public, to provide essential habitat for wildlife, or for the solar evaporation of seawater in the course of salt production for commercial purposes".

Aesthetics

The NOP mischaracterizes the site as "industrial-type" open space (page 41). This is an inaccurate description that should be corrected in the second NOP and the project Environmental Impact Report (EIR). Both documents should reflect the actual open space visual conditions at the site, and during all seasons.

The ponds are covered with rainwater during late fall, winter and early spring and with various salt solutions during summer/fall when active salt making operations are taking place. Foraging and roosting waterfowl can be observed using the ponds and levees to varying degrees throughout the year. The open waters and inherent wildlife values of Bay salt ponds, and the open space "big sky" vistas of Greco Island, First Slough, the Bay, Bidwell Bayfront Park and the East Bay hills are not "industrial" in nature as shown in the photographs below.





The NOP states that the project would result in massing of structures amidst open space including buildings up to seven stories high. The NOP specifically documents that existing views from the adjacent mobile home neighborhood of nearby Greco Island, the open waters of the Bay and the East and South Bay hills would be blocked. The NOP should note that neighborhood views would also be blocked by the 13-foot tall flood levee. Redwood City residents living adjacent to the project site could also have shadow-related impacts from the buildings, and light and glare impacts from ball fields and project buildings. These potentially significant impacts that are documented in the NOP should be thoroughly analyzed in the EIR and mitigated to a "no impact" level.

The EIR should provide photo simulations of the site from a variety of vantage points within Redwood City and the region, as well as from across the Bay. Impacts from Project glare and nighttime lighting should be analyzed.

Alternatives

The City's failure to provide the community with the "basic project objectives" for the Saltworks Project precludes us from submitting suggested alternatives at this time. The City Council and staff assured the community that the City's project objectives for the Saltworks site would be available before the end of this scoping comment period (March 31, 2011), and this is documented in the record. Without the basic project objectives, the City cannot assure the community that any suggested alternatives submitted now will meet the CEQA requirements necessary for formal consideration.

The City's "Alternatives Development Report" should be postponed until this serious deficiency in the public process the City outlined for the Saltworks Project CEQA review is remedied. The City's "basic project objectives" should be provided to the community prior to, or as a component of, the second Saltworks Project Notice of Preparation.

Thank you for the opportunity to provide comments on the Saltworks Project NOP.

Sincerely,



Ralph Nobles
Founding Member
Friends of Redwood City



Florence La Riviere
Chairperson
Citizens Committee to Complete the Refuge

cc: USACE
EPA
SFBRWQCB
BCDC
USFWS, Sacramento
USFWS, DESFBNWR

CDFG

NMFS

US Senator Dianne Feinstein

US Senator Barbara Boxer

US Representative Anna Eshoo

US Representative Jackie Speier

State Senator Joe Simitian

State Assemblymember Rich Gordon

San Mateo County Board of Supervisors

Redwood City City Council