



## CITIZENS COMMITTEE TO COMPLETE THE REFUGE

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Redwood City Planning Services  
Lindy Chan, Senior Planner  
1017 Middlefield Road  
Redwood City, CA 94063.  
[lchan@redwoodcity.org](mailto:lchan@redwoodcity.org)

RE: Notice of Preparation for a Draft Environmental Impact Report for the Proposed  
Oracle Design Tech High School, July 10, 2015

Dear Ms. Chan:

Citizens Committee to Complete the Refuge appreciates the opportunity to respond and provide scoping comments on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Proposed Oracle Design Tech High School (Project).

The Citizens Committee to Complete the Refuge has an ongoing interest in wetlands protection, restoration and acquisition. Our efforts have led to the establishment and expansion of the San Francisco Bay National Wildlife Refuge, including the addition of 1600 acres at Bair Island in Redwood City. We have taken an active interest in Clean Water Act, Endangered Species Act and California Environmental Quality Act regulations, policies and implementation at the local, state and national levels, demonstrating our ongoing commitment to wetland issues.

The City's NOP states that the 4.1-acre project site is "comprised of a surface parking lot and open space adjacent to Belmont Slough and the Bay Trail". The Project entails constructing a high school campus for 550 students and 30 employees that would include a two-story 75,000 square foot building, an employee parking lot, student drop-off area, public access points to the Bay Trail from the school and outdoor amenities such as amphitheaters. The Project also would include modifications to the existing Bay Trail.

The close proximity of the Project to the waters, mudflats and tidal marsh of Belmont Slough and the associated sensitive and special status wildlife species using these habitats is cause for concern. Additionally, two significant ecological resources, the Redwood Shores Ecological Reserve and the Redwood Shores State Marine Park, are both near the area of the Project. For this reason, our scoping comments will focus primarily on Biological Resources.

### **Biological Resources**

**Existing Conditions:** The DEIR must provide an accurate description of existing conditions on the Project site as well as adjacent areas that could be impacted by the Project. Locations and distances from the edge of the high school campus to the adjacent uplands, tidal marsh, and waters of Belmont Slough should be delineated.

The location of the Redwood Shores Ecological Reserve and the Redwood Shores State Marine Park in relation to the Project site should be delineated in the DEIR as well.

Special status species and other wildlife currently using the adjacent resources in and along nearby Belmont Slough that could potentially be impacted by the project should be identified, as well as habitat suitable for endangered species.

The undeveloped “open field” portion of the Project site contains a number of plant species that are typically indicative of wetlands including pickleweed, saltgrass, alkali-heath and sea-lavender (marsh-rosemary). Vegetation in this area should be surveyed and appropriate agencies consulted regarding the possible wetland status of this site so that the DEIR can include mitigation measures if required.

All federal, state and regional agencies with jurisdiction over the Project site and adjacent areas that could be impacted should be identified in the DEIR and the basis for their jurisdiction should be provided.

**Potential Impacts:** The unique location of the Project combined with the proposed high school use for this site is problematic. The campus is less than 100 feet from Belmont Slough and its associated tidal marsh and wildlife. Potential impacts from the Project include the following:

Bird strike hazards – Belmont Slough provides roosting and foraging habitat for birds, and migratory shorebirds and other waterfowl may traverse the Project area. How will bird strike hazards associated with the new two-story building be mitigated?

Light - Artificial night lighting that intrudes into nearby wildlife habitats can be disruptive, and may also result in increased predation. Due to the close proximity to Belmont Slough, the DEIR should determine what lighting design and operational measures would be required in the building and for the perimeter of the campus to eliminate this impact?

Outdoor areas and litter – Food scraps left in any outdoor areas and garbage/recycling receptacles could attract nuisance/predatory species such as crows, ravens, gulls and rodents to the detriment of wildlife in adjacent Belmont Slough. How would this impact be mitigated?

The Project could generate litter that would pollute the tidal marsh and waters of Belmont Slough, endangering wildlife in the immediate area, or get carried with the tides and currents to other locations in Belmont Slough and San Francisco Bay. What mitigation measures would be put in place to ensure that the Project does not cause an increase in the amount of litter entering Belmont Slough, either at the campus location or from increased use of the Bay Trail?

Predator perches – The additional trees, the two-story building and light poles associated with the proposed Project could provide perches for predatory birds such as hawks, falcons, crows and ravens in very close proximity to Belmont Slough. Rails and harvest mice are especially vulnerable to predators during high tides, when they are more exposed in the higher marsh and on the sides of levees. The DEIR should outline requirements for building and landscape design elements that would mitigate this impact.

Noise and Vibration – Construction of the proposed Project could impact special status species and other wildlife due to noise and vibration from construction equipment. Noise associated with Project-based activities such as building and landscape operations, outdoor activities on the campus and increased use of the Bay Trail could disturb nearby wildlife. How will these impacts be mitigated?

Human disturbance – The DEIR should determine to what extent the level of activity on the Bay Trail will increase in the vicinity of the Project from high school students and employees. Will the types of activities on the trail change, causing greater impacts from human disturbance? Would greater use of the Bay Trail in a concentrated area negatively impact wildlife and how could impacts be mitigated?

Recovery and Conservation Plans - The DEIR should document and consider that all of Belmont Slough is included in the 2013 U.S. Fish and Wildlife Service *Recovery Plan for Tidal Marsh Ecosystems of Northern and Central California*, which identifies strategies and geographic areas suitable for the recovery of federally listed species such as the salt marsh harvest mouse and Ridgeway's rail (formerly California clapper rail) in San Francisco Bay. How will the existing suitable habitat for these two endangered species be protected from impacts associated with the Project?

Impacts to wildlife may range from loss of habitat, increased predation, inability to conduct daily functions (roosting, foraging, breeding, nesting, etc.), detrimental expenditures of energy as wildlife move away from repeated disturbance, reduced recruitment, greater distance traveled to roost sites, etc. Potential impacts to wildlife resources must have effective and enforceable mitigation measures proposed in the DEIR.

### **Hydrology and Water Quality**

The Project site is adjacent to sensitive aquatic and tidal marsh habitats that could be adversely affected by construction activities and stormwater runoff. Construction activities, including fill and grading, could pollute these sites with excess sediment, and with chemical contamination from construction materials such as concrete, mortar, hydrated lime, fuels and paint. Stormwater run-off from the landscaped areas on the high school campus could carry pesticides and herbicides. The DEIR must analyze these potential impacts and provide mitigation measures to prevent pollutants from affecting the sensitive sites and wildlife in Belmont Slough.

According to the NOP, the DEIR will “address the potential for sea level rise to impact the site”. The DEIR must provide adequate information on the proposed measures that will be employed to address flooding from sea level rise specifically, so that the environmental analysis in the DEIR can be evaluated. Any measures proposed should not impact sensitive habitats adjacent to the Project Area.

The DEIR should analyze the effectiveness of any proposed measures at various sea level rise scenarios, and consider potential impacts from future modification of these flood protection measures in the event sea level rise exceeds projections. It appears that the proposed high school campus would abut the existing levee; therefore, any future changes in the height/width of the levee to address sea level rise could result in impacts to Belmont Slough uplands or tidal marsh habitats or the public Bay Trail. The DEIR should determine if the proposed high school campus boundary should be set further back from the levee in order to ensure there would be adequate room to accommodate any future levee expansion.

### **Alternatives**

The applicant's Project Description states that the “goal is to provide an exceptional school with a permanent home on the Oracle headquarters campus.” Additionally, the overall plan for the Oracle Design Tech High School includes a number of amenities that would be provided by Oracle, including the use of certain Oracle facilities.

This important objective of the Project could still be achieved if the high school campus was located at an alternative location within the area covered by the Oracle Office Campus Planned Development Permit. Avoiding the environmentally sensitive site adjacent to Belmont Slough would eliminate adverse impacts to important biological resources. For this reason, the DEIR should study an alternative that includes locating the high school at another site within the larger Oracle campus.

We thank you for the opportunity to provide comments on the Proposed Oracle Design Tech High School NOP.

Sincerely,



Gail Raabe  
Board Member  
Citizens Committee to Complete the Refuge

cc: CDFW  
USFWS  
SFBRWQCB  
Florence LaRiviere, CCCR  
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