



CITIZENS COMMITTEE TO COMPLETE THE REFUGE

PO Box 23957 San Jose, CA 95153

cccrrefuge@gmail.com

www.bayrefuge.org

September 22, 2025

Redwood City Planning Services
Attention: Margaret Netto, Principal Planner
1017 Middlefield Road
Redwood City, CA 94063
Via email: mnetto@redwoodcity.org

RE: Comments in Response to the Notice of Preparation of an Environmental Impact Report for the Redwood Life Precise Plan, August 22, 2025

Dear Ms. Netto:

Citizens Committee to Complete the Refuge appreciates the opportunity to provide scoping comments in response to the August 22, 2025 Notice of Preparation of an Environmental Impact Report for the Redwood Life Precise Plan (NOP). Our organization has been following the proposed Redwood Life Project (Project) for several years, and we have been an active participant in a number of City meetings and community outreach events on this project.

Citizens Committee to Complete the Refuge (CCCR) has spent decades protecting the Bay's tidal wetlands and listed and rare species, and has an ongoing interest in wetlands restoration and acquisition. Our senior members worked with Congressman Don Edwards to obtain congressional authorization in 1972 to establish the Don Edwards San Francisco Bay National Wildlife Refuge. Since then, our organization has taken an active interest in Clean Water Act, Endangered Species Act and California Environmental Quality Act/National Environmental Policy Act regulations and implementation at the local, state and national levels, demonstrating our ongoing commitment to wetland, wildlife and Refuge issues.

Additionally, CCCR has 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, Bay Adapt and the Regional Shoreline Adaptation Plan processes, the San Francisco Estuary Partnership, the San Francisco Bay Joint Venture, the South Bay Salt Pond Restoration Project, and in the development of the State Water Resources Control Board's state definition of wetlands and Dredge Fill Procedures. Our stakeholder participation in these regional, state and federal regulatory, policy and planning efforts demonstrates our recognition of the threats posed by climate change, and more specifically sea level and groundwater rise, and the role the Bay's habitats play in providing climate resilience for our communities and for the health of the Bay.

Primary Concerns and Focus of Scoping Comments:

The Project site is directly adjacent to a portion of Belmont Slough which has been designated by the State as the Redwood Shores Ecological Reserve and the Redwood Shores State Marine Park (consisting of waters below the mean high tide line within the reserve). The environmentally sensitive

tidal marsh, mudflat and open water habitats within this reserve are owned and managed by the California Department of Fish and Wildlife. Wildlife residing and utilizing the reserve habitats include a number of federal and state endangered and threatened species of fish, birds and mammals. In addition, thousands of migratory shorebirds forage on slough mudflats. A number of potential Project impacts could adversely impact sensitive habitats and wildlife in Belmont slough.

We have additional concerns with the proposed massive redevelopment project impacting the unlined former Westpoint Landfill that underlies most of the Project site. Specifically, we are very worried that the new construction of twelve, large, multistory buildings and four parking garages could compromise the integrity of the landfill cap and perimeter clay walls, potentially leading to off-site movement of landfill contaminants into the ecologically-sensitive wetlands, waters of Belmont Slough, and ultimately the Bay.

For the reasons outlined above, the primary focus of our scoping comments will be related to the landfill, Biological Resources and Sea Level Rise.

Inadequate Information Provided in the NOP:

Although the Project site is on a former landfill that is directly adjacent to an ecological reserve with jurisdictional wetlands and many listed species, the NOP for the Project fails to provide the public and federal, state and regional regulatory and resource agencies with this critical information. Such information is critical as it could lead to the identification of project impacts to the environment that might not be otherwise identified.

The Project NOP states: *“The City is interested in the views of your agency as to the appropriate scope and content of the Draft EIR, as well as any mitigation measures or alternatives related to agencies’ statutory responsibilities.”*

Receiving input from agencies early in the environmental review process is of value to decision-makers, but more importantly to project proponents, as full disclosure of potential issues ensures a robust review process that will reduce the likelihood of discovering unintended consequences of the project that could ultimately lead to lengthy and costly delays, and expenditures of agency staff time and resources. The primary goal of sending out a notice that a project EIR is being prepared, should be to provide enough information to adequately guide the preparation of an EIR, and yet nowhere in the NOP does the City mention the fact that the project site is located on a former landfill at the edge of San Francisco Bay.

At the September 2, 2025 Planning Commission Public Hearing for the Project EIR scoping, CCCR advised the City and the Commissioners that it was irresponsible to omit this important site information in the NOP being provided to the agencies, and we urged the City, as the lead agency under CEQA, to re-issue an amended Notice of Preparation with the important landfill information included.

CCCR again reiterates our concern that the NOP was inadequate, and we again request that an amended notice be issued.

Project Location: According to the NOP, *“The proposed Redwood Life Precise Plan (also referred to as the “Precise Plan” or “project”) area is located at 800, 1400, 1600, and 3400 Bridge Parkway in Redwood City, generally located between Belmont Slough and Marine Parkway. The project site totals approximately 84 acres and consists of four parcels...The project site is currently developed with the*

Redwood LIFE office park, which consists of 20, two-story buildings, totaling 967,680 square feet of research and development office and life science uses. The project site is bordered by Bridge Parkway and Belmont Slough to the north and west, and single-family and multifamily residential uses to the east and south.”

Project Description: According to the NOP, “*The project includes repeal of the existing Westport Specific Plan and the adoption of the new Precise Plan to replace it. The project is consistent with the property’s General Plan land use designation. However, in order to establish the new Precise Plan, the property would be rezoned to precise plan zoning. The project applicant proposes to demolish the existing 20 life science buildings and associated surface parking in order to construct 11 life science buildings totaling approximately 2.731 million square feet (a net increase of 1.764 million square feet compared to existing conditions), an approximately 20,000 square-foot community amenity center within one of the life science buildings, an approximately 104-room hotel, and four parking garages. The life science buildings would range from five- to six-stories tall with a maximum roof height of approximately 100 feet (and approximately 120 feet to the top of the mechanical equipment screening). The hotel would be five-stories tall, with a maximum roof height of approximately 85 feet (and approximately 95 feet to the top of the mechanical equipment screening). The life science and hotel buildings would also include signage on the outside. The parking garages would be five- to eight-levels tall, with a maximum height of approximately 77 feet. The project proposes a total of approximately 42.4-acres of open space throughout the project site, including 38.7-acres of privately-owned, publicly-accessible (POPA) open space. The project also proposes to construct sea-level rise improvements along the existing levee on Belmont Slough and will construct new infrastructure and utility improvements on- and off-site.”*

Documents Relied On: Below are the primary documents from the City’s Redwood Life Precise Plan website¹ that informed our NOP scoping comments:

- 1) Redwood Life Planning Application 3, 8/5/25 (APPL 3)
- 2) Redwood Life Planning Application Update, 11/4/22 (PLAN Update)
- 3) Redwood Life Precise Plan Biological Constraints Analysis, H.T. Harvey, 8/19/24 (BIO Analysis)
- 4) Approach to Addressing Coastal Flooding and Sea level Rise, Redwood Life Evolve; Moffat & Nichol Memorandum, May 17, 2024 (SLR Memo)
- 5) Roux Site Summary Report, Redwood Life Campus, June 2, 2022 (Roux Report)

Comments

Former Westport Landfill

According to the Roux Report, the Project site, “...was predominately wetlands on the edge of San Francisco Bay until the early 1900s when the Site was dredged and filled for use as pastureland and hog farming. In the early 1910s, levees/dikes were installed around the perimeter of the Site ...A portion of the site began operating as a municipal landfill from approximately 1948 until 1970. From 1948 to 1957, combustible wastes were burned on-site, and the ash was placed in the Panhandle area (Levine-Fricke, 1989). Approximately 50% of the site is underlain by a contiguous refuse layer that

¹ <https://www.redwoodcity.org/city-hall/current-projects/development-projects?id=113>

ranges from 35 to 3-feet deep. Another 40% is underlain by areas of sporadically encountered refuse that may vary from 6-inches to 36-inches deep...

...The Site was graded and further filled in the late 1970s. In the mid-1990s, additional fill was imported and graded across the Site in preparation for the Westport Office Park development. As part of the regrading for new development, the landfill cap was reconstructed to ensure there was a minimum 2-foot-thick clay cap (and other cap requirements) and a 2-foot-wide vertical clay wall was built that connected the edges of the landfill cap to the young Bay Mud underlying the Site...The existing twenty buildings were constructed from 1997 to 1998 and included the installation of a landfill gas venting and monitoring system under all buildings.” (Executive Report pages 1,2)

There are number of past reports and regulatory agency documents related to the characterization of the landfill waste, present landfill site conditions and past issues, and also to leachate, groundwater and air monitoring reports. To ensure our scoping comments identify issues that require additional technical analysis and review in the DEIR, we have retained the services of Paul Nuti, P.E. with Veritas Environmental Consulting, Inc. The focus of Mr. Nuti’s review is to identify any potential for Project impacts that could threaten the integrity of the landfill, resulting in possible significant impacts to the environment. The DEIR must analyze and discuss how any potential Project impacts would be avoided, minimized or mitigated.

The attached *Technical Memorandum: Redwood Life Precise Plan Project at the Former Westport Landfill – Scoping Comments for the Environmental Impact Report* from Paul M. Nuti, P.E. is incorporated by reference into this letter, and should be considered part of CCCR’s scoping comments for the Project DEIR. (See Attachment 1)

Historical Disposal of Radioactive Waste in Landfills

An additional CCCR concern is related to the historical disposal of Stauffer Chemical Company radioactive waste into Bay area landfills. This has recently been in the news (*Los Angeles Times* May15, 2024)², with known disposal locations in Richmond, Berkeley, Benicia and Albany. Greatly elevated levels of Radium-226 were recently detected in the groundwater and leachate at a former landfill site in Berkeley that is now Cesar Chavez Park (*San Francisco Chronicle* July 31, 2025)³. According to the *Chronicle*, Radium-226 is a powerful radiation emitter that decays into radon gas and has a half-life of 1,600 years. It is found in alum mud, a byproduct from Stauffer’s production of sulfuric acid.

Because the California Department of Toxic Substances Control, “...is unaware of whether radioactive material was disposed of at other sites”⁴ and Stauffer Chemical had operations in San Francisco as well as the East Bay, there is a reasonable possibility that the same radioactive material could have been disposed of at the Westport Landfill in Redwood Shores, which was operating during the same period as the Berkeley landfill.

² Los Angeles Times May 15, 2024: <https://www.latimes.com/environment/story/2024-05-14/bay-area-radioactive-waste>

³ S.F. Chronicle, July 31, 2025: <https://www.sfchronicle.com/bayarea/article/berkeley-cesar-chavez-park-pollution-20796297.php>

⁴ San Francisco Chronicle May 14, 2024: <https://www.sfchronicle.com/eastbay/article/toxic-radioactive-waste-parks-19457479.php>

Radioactive waste could pose a potential hazard to people, water quality and wildlife. If present, Radium-226 could move through the Silicon Valley Clean Water sewer system/plant from the continuous disposal of leachate from the Westport landfill, and possibly move offsite into Belmont Slough in groundwater, or leachate moving offsite. For this reason, the DEIR should provide any information on past testing for the presence of radioactivity at the former landfill. If no testing has occurred, as a precaution, such testing should be conducted and the results included in the DEIR. The analysis should include testing for elevated levels of radioactivity in the soil, in landfill leachate, and in groundwater from sentinel wells around the perimeter of the site, and testing should include checking for radon in air collection samples including those taken as part of the landfill gas monitoring program. The results of this testing and any proposed remediation measures, if necessary, should be included in the DEIR. In addition, if the results indicate the presence of any radioactive waste, this information must be shared immediately with the appropriate regulatory and resource agencies.

Sea Level Rise

Consistency With Relevant Documents:

The SLR Memo outlines the Project's compliance with applicable Bay Conservation and Development Commission (BCDC) *Bay Plan* guidance policies and OneShoreline Planning Policy Guidance (page 13).

The DEIR must additionally discuss how the Project relates to Redwood City's compliance with the requirements and policies in the BCDC *Regional Shoreline Adaptation Plan (RSAP)*⁵ released in December 2024. The RSAP is a regional plan to address rising sea levels in San Francisco Bay that provides a region-wide vision and priorities for a resilient San Francisco Bay shoreline. It also contains Guidelines that local governments must follow when developing a required Subregional Shoreline Adaptation Plan, including prioritizing "natural and nature-based adaptation measures". How will the levee and Bay Trail plans for the Project's section of shoreline along Belmont Slough be integrated into Redwood City's Subregional Shoreline Adaptation Plan?

The DEIR should describe possible levee design and setback alternatives that are consistent with the RSAP regional priority of "Complete and Connected Ecosystems", identifying specific ways the Project can provide opportunities, as outlined in the RSAP, to:

- *Protect, restore, and enhance Baylands ecosystems to improve their function, scale, biodiversity, and services, and meet regional habitat goals.*
- *Prioritize nature-based solutions where possible and incorporate habitat connectivity, sediment management, and whole watershed approaches into shoreline planning and projects.*
- *Identify and facilitate opportunities for ecosystems to migrate landward to support and enhance natural adaptation processes.*

⁵ <https://www.bcdc.ca.gov/wp-content/uploads/sites/354/2024/11/Appendix-B-Regional-Shoreline-Adaptation-Plan-spread.pdf>

Integration with OneShoreline's Redwood Shores Sea Level Rise Protection Project:

The San Mateo County Flood and Sea Level Rise Resiliency District, also known as OneShoreline, has initiated a Redwood Shores Sea Level Rise Protection Project with three project partners, the City of Redwood City, the City of San Carlos and the County of San Mateo. This OneShoreline levee improvement project seeks to 1) avoid Redwood Shores being designated as a FEMA Special Flood Hazard Area; and 2) establish long-term resilience against sea level rise that would benefit the region.

How will the Project's section of new levee improvements along Belmont Slough be connected and integrated with the OneShoreline levee improvements for the rest of Redwood Shores? How will planning, design, engineering and construction be coordinated to avoid duplication of effort or project delays for both the levee and Bay Trail?

The DEIR should include a discussion on effective and efficient approaches for integrating the two projects, and potential shared opportunities for implementing natural and nature-based SLR adaptation measures and tidal marsh restoration.

Fill Associated with Sea Level Rise Protection Measures:

The SLR Memo includes the following information about the project:

"1. Flood Protection for Proposed Development

A fundamental decision that has been made for the project is to build a community that does not rely on flood control levees around its periphery. The implications of this decision are:

- Elevate development pads, streets, infrastructure, and open spaces such that they would be above end-of-century flood water levels after factoring in tides, storms, and conservative SLR projections*
- Leave adequate setback between the existing shoreline and the development to accommodate even higher SLR projections, such that a variety of flood control measures can be constructed in the future*

2. Flood Protection for Adjacent Communities

Another decision that was made is to raise the existing flood control levee within the Property boundaries to provide protection against future SLR-influenced water levels even though the project will not rely on it for flood protection. This element will provide continued flood protection in the future, compliant with FEMA criteria, for communities outside the project footprint." (Page 12)

The Project SLR Memo includes a *Figure 4: Site Topography* graphic on page 3 that provides color-coded elevation ranges for the entire 84-acre site. Based on that figure, roughly 50% of the site will require some amount of fill to raise elevations to the minimum height (16.9 – 17 feet) planned for sea level rise protection through year 2100.

The DEIR should provide information on the estimated quantity of fill that will be required to raise the existing flood control levee and raise elevations throughout the site. Additionally, the potential source(s) of the fill should be identified and the number of truckloads, the truck route(s) through Redwood Shores, and the period of time required to transport and place the fill should be provided. Impacts from noise, dust and air pollution from the trucks transporting fill, and impacts on local traffic should be identified, analyzed, and mitigated.

In addition, the DEIR should identify the volume and weight of the fill required to raise the elevations atop areas of the landfill. An identification and assessment of potential impacts that might arise from the additional load of the fill required to raise the site elevation, in combination with the increased load of the proposed multi-storied buildings and additional development, should be provided in the DEIR, along with any mitigation measures that might be required to address the impacts.

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. A map showing the location of tidal marsh, mudflat and open water habitats in the adjacent section of Belmont Slough, and a map specifically showing the location of the State's Redwood Shores Ecological Reserve/Redwood Shores Marine Park must be included in the DEIR.

Special status plant and animal species, and other important wildlife, such as migratory waterbirds, should be identified in the DEIR, and the location of suitable habitat, including Essential Fish Habitat, found in the general area, on the actual Project site, and in Belmont Slough should be provided.

All federal, state and regional agencies with jurisdiction over the Project site, the adjacent wetlands, mudflats and open waters in Belmont Slough and the associated listed species must be identified in the DEIR, and information on regulatory requirements/restrictions applicable to the Project and adjacent areas must be provided.

Construction Impacts on Tidal Marsh:

In the discussion on Project features that address sea level rise, the SLR Memo includes the following information regarding the construction of the flood control levee and Bay Trail:

"In terms of construction activities that could affect habitat communities on the Slough side of the levees, almost all of the proposed grading activities will be above the High Tide Line (HTL) along Belmont Slough. The only exception is the northeast segment along the marsh where trail and levee improvements will likely go below the HTL" (Page 12) (Emphasis added)

The excerpt below from the BIO Analysis outlines the regulatory implications and the potential for significant biological impacts to endangered species if Project elements like the new levee are designed to include incursions into tidal marsh and existing outboard levee slopes along Belmont Slough.

"We recommend that any development within the study area be designed to avoid impacts to tidal salt marsh and diked brackish marsh habitats and to avoid, or at least minimize, impacts to levee slope habitat. Avoiding impacts to these regulated habitats altogether would avoid the need for permits from the USACE, RWQCB, and CDFW. If impacts to wetlands cannot be avoided, such impacts should be minimized to facilitate permitting and reduce compensatory mitigation needs. The regulatory agencies will require that the project proponent demonstrate that impacts have been minimized to the maximum extent practicable...Avoiding impacts to marsh and levee slope habitats would also avoid direct impacts to the salt marsh harvest mouse and salt marsh wandering shrew, and to habitat potentially used by the California Ridgway's rail and California black rail." (Page 33) (Emphasis added)

The DEIR must clearly identify the specific location(s) of the areas directly impacted by new levee construction, the total acreage of tidal and brackish marsh habitat impacted, the total acreage of jurisdictional wetlands and other waters impacted and the mitigation for any temporary and/or permanent loss of habitat. The DEIR should also indicate the locations of potential permanent and temporary indirect impacts to tidal and brackish marsh and other baylands habitats.

Additionally, the water quality construction BMPs and the required mitigation measures for avoidance and protection from harm for the SMHM during construction that are outlined in the BIO Analysis must be included in the DEIR as enforceable mitigation measures.

Inadequate and Inconsistent Description of Levee and Bay Improvements:

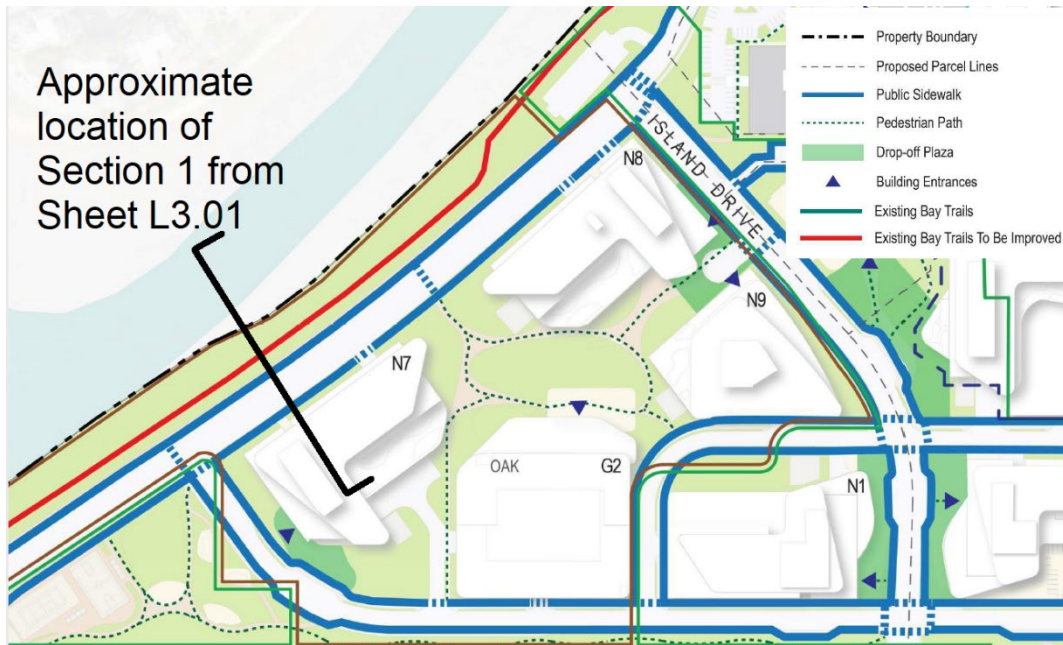
The information in the project documents available on the Redwood City web page either do not provide, or appear to provide inconsistent information regarding the proposed “...sea-level rise improvements along the existing levee on Belmont Slough” as described in the Project Description in the NOP.

After reviewing the two Project plans and the Plan Update, the only reference to any improvement along the existing levee was found in the Plan Update on Sheet A5.12, *Neighborhood View – Bay Trail – Phase 4*, which states, “New pedestrian and bicycle crossing points at Bridge Parkway provide additional, safe access to the Bay Trail and Belmont Slough. The enhanced Bay Trail is organized into cyclist, pedestrian and jobbing lanes to improve safety and to elevate the shoreline experience for Redwood Shores residents and visitors.”

It appears that there is inconsistent information in the Plan Update regarding the Belmont Slough shoreline. Illustrations on Sheet L3.01, *Site Sections*, show two pedestrian trails: the existing Bay Trail and a new trail atop a proposed new levee, while Sheet L6.04, *Pedestrian Circulation Phase 4*, only shows an improved Bay Trail and no new levee with a trail on top:



Modified excerpt from Sheet L3.01, *Site Sections*, showing horizontal location of section 1 (left), and the vertical section with two trails (right).



Modified excerpt from Sheet L6.04, *Pedestrian Circulation Phase 4*, showing only the Bay Trail and no trail atop a levee.

In order to analyze potential impacts to habitat and wildlife along Belmont Slough, a stable project description must be provided. An accurate location of the proposed new levee and trail improvements needs to be provided, and described in a clear and consistent manner in all project documents and throughout the DEIR. Detailed information on the design, dimensions and construction of the levee and Bay Trail must be provided in the DEIR, as they are missing from project plan documents.

Levee Placement and Natural and Nature-Based Adaptation Opportunities:

The DEIR should discuss opportunities to implement a “natural and nature-based” (NNBS) SLR adaption measure by pulling the new levee/Bay Trail back from the Project property line wherever possible along Belmont Slough. Constructing the new levee so the toe of the proposed levee improvement is above the high tide line (HTL) would avoid any permanent levee incursions into tidal marsh and would create a longer sloped outboard levee to provide for some degree of SLR marsh migration and additional high tide refugia for endangered Salt Marsh Harvest Mouse.

Invasive Iceplant Removal:

Iceplant (*Carpobrotus edulis*) is extensively established along the segment of the Bay Trail adjacent to the Project. It is a highly invasive plant from South Africa⁶. Because of its invasiveness and impact to native plant species, the California Department of Fish and Wildlife encourages people to not plant this species⁷.

The Plan Update illustration on Sheet A5.12, *Neighborhood View-Bay Trail-Phase 4*, shows partial removal of the iceplant along Belmont Slough with new plantings of native grasses. **The DEIR must**

⁶ <https://www.cal-ipc.org/plants/profile/carpobrotus-edulis-profile>

⁷ <https://wildlife.ca.gov/Conservation/Plants/Dont-Plant-Me/Iceplant>

address how the new planting of native grasses will survive without the complete removal of the invasive iceplant in immediately adjacent areas.

Rather than removing this invasive plant in only certain areas with little chance of long-term success, the DEIR should consider an alternative of working collaboratively with the CA Department of Fish and Wildlife to remove the existing invasive iceplant on Project and State land all along this section of Belmont Slough.

A restoration component could be added to the Project's new flood protection/Bay Trail levee by replacing the iceplant with "high marsh" native plants (such as gumplant, alkali-heath, saltgrass and Atriplex), including on lower reaches of the outboard levee slope. Tidal marsh restoration could make this element of the flood protection project possibly eligible for regional NNBS grant funding, and would be consistent with the RSAP priority to "...*restore, and enhance Baylands ecosystems to improve their function, scale, biodiversity, and services...*"

Predator Perches:

Landscaping trees, the new taller buildings and light poles and other structures and signs associated with the Project could provide perches for predatory birds such as hawks, falcons, gulls, crows and ravens. Trees can provide avian predator nesting sites in very close proximity to tidal marsh where trees naturally never occurred. Endangered rails and SMHM are especially vulnerable to predators during high tides, when they seek refuge and are more exposed in the higher marsh and on the sides of levees.

The landscape elements in the PLAN Update, *NEIGHBORHOOD VIEW 1 - BAY TRAIL - PHASE 4* (Sheet A5.12) indicate: "*New willows and coast live oaks are planted to provide shade for benches along the trail and restore the native planting communities of the Bay Area.*"

The replacement of existing small, dense-crowned trees with large, open-crowned coast live oaks along the section of Bay Trail adjacent to Belmont Slough could cause increased risk of raptor predation on wildlife using salt marsh and mudflat habitat, including foraging and roosting migratory shorebirds.

The existing Bay Trail and adjacent landscaped areas in the Project plan are within the 100-foot shoreline band and are under the jurisdiction of the San Francisco Bay Conservation and Development Commission (BCDC), whose guidelines⁸ state, "*Avoid planting trees next to tidal marshes (generally no closer than 200 feet) where they may provide perches for raptors that prey upon endangered species.*" (Emphasis added)

Landscape trees vary in their suitability to serve as perching or nesting sites for avian predators. For trees proposed for planting beyond the buffer from the edge of the marsh, the DEIR must provide criteria for the selection of tree species as a mitigation measure to ensure there is no increase in perching/nesting sites for predatory birds. Attached is a list of suitable tree species for planting near bay wetland habitats compiled for the Pacific Shores Center project near Westpoint Slough in Redwood City. (See Attachment 1: Pacific Shores Center Tree Suitability Index).

The DEIR should include specific mitigation measures for this impact, including placing trees back from marsh areas, and utilization of the Landscape Tree Suitability Index required for the Pacific Shores Center and Westpoint Marina projects in Redwood City.

⁸ Shoreline Plants A LANDSCAPE GUIDE FOR THE SAN FRANCISCO BAY, March 2007 BCDC. Available at: <https://www.bcdc.ca.gov/wp-content/uploads/sites/354/2023/09/Landscape-Guide-for-the-San-Francisco-Bay-Shoreline-Plants-PDF.pdf>

Additionally, the DEIR should include a mitigation measure that requires bird spikes or other perch deterrents on any tall surfaces or structures near Belmont Slough that could serve as predator perches such as roof edges, street lighting or signs.

Lighting:

The BIO Analysis includes a discussion of the adverse impacts that night lighting can have on wildlife utilizing the tidal marsh and levee slope in Belmont Slough:

“...In addition, increases in lighting that spills over into wetlands should be avoided. Such lighting could increase predation of salt marsh harvest mice and salt marsh wandering shrews, and we expect that CEQA mitigation measures or Section 7 consultation conditions will include measures to avoid increases in lighting in suitable habitat for these species. For example, appropriate CEQA mitigation measures would require that lighting on the site be minimized to that necessary for human safety, and that all lighting be shielded to prevent it from shining into wetlands.” (Page 25)

The DEIR should identify the impact of lighting to endangered species and other wildlife utilizing the tidal marsh and levee slope habitat and include specific mitigation measures to ensure there is no spillage of light into these areas. Required measures could include shielding and angling of new street, parking garage and exterior lights, and given the Project’s increased building heights, utilization of timers, dimmers, motion sensors and automatic shades in buildings near Belmont Slough.

Bird-Strike Hazards:

Section 3.2.11 Avian-Building Collisions in the BIO Analysis (pages 30-32) provides a very comprehensive discussion of the need for mitigation for a potential increase in bird strike impacts with the construction of the larger, higher and greater number of new buildings in the Project stating: “...bird-building collisions could potentially increase compared to baseline conditions, if the design of new buildings incorporates extensive glazing, intense lighting, or up-lighting. Given the value of the Bay shoreline to birds, relatively large numbers of birds compared to other neighboring areas (e.g., Burlingame and San Mateo) are expected to utilize and/or fly through the site over the long term. Enough individuals of a variety of species can potentially strike the buildings over the long term that the City could potentially consider bird-building collisions to be a potentially significant impact under CEQA if extensive glazing or intense/upward-directed lighting were proposed. However, implementation of mitigation measures described below would reduce the impact to less-than-significant levels under CEQA, and no regulatory agency approvals related to bird-building collisions would be necessary.”

In the BIO Analysis, a list of eight “Typical Mitigation Requirements” are provided for consideration. These are consistent with mitigation measures required for other bayfront projects in the Bay Area, including in Redwood City, where the *Draft Environmental Impact Report for the 557 East Bayshore Road Project* (David J. Powers & Associates, August 2022)⁹ lists similar requirements in the report’s *MM BIO-1.11 Implement Bird-Safe Building Design* (page 70-71). That DEIR also included the following mitigation measure to address potential bird-strike hazards for other structural and landscape features as shown below:

⁹ https://webgis.redwoodcity.org/community/documents/projects/phed/67/557_e._bayshore_road_draft_eir_-_8.10.22.pdf

“Avoid free-standing clear glass walls, skywalks, transparent building corners, glass enclosures (e.g., greenhouses) on rooftops, and balconies with unbroken glazed segments 24 square feet and larger where feasible. If any such features are included in the façade areas of Buildings A and B indicated in red on Figure 3.4-2, all glazing used in any such features shall be 100 percent treated.”

Each of the eight requirements for preventing avian building collisions outlined in the BIO Analysis, and the measures above for preventing collisions with other hazardous structural features or landscape elements in the Project, should all be included in the Project DEIR as formal mitigation measures to ensure implementation and enforceability.

Shadow Impacts:

The BIO Analysis includes a discussion on potential impacts from shadowing (Pages 12-13) on the adjacent tidal marsh in Belmont Slough:

“Buildings constructed in the study area could potentially shade wetland vegetation in areas along Belmont Slough. In our opinion, such shading would not represent a significant impact under CEQA if the buildings were set back far enough from the tidal salt marsh, diked salt marsh, and levee slope that sufficient light to maintain wetland vegetation, without a substantial reduction in health or vigor, will continue to reach that vegetation. However, if buildings constructed on the site are taller than existing buildings and/or constructed closer to the edge of the tidal marsh, shading from those buildings could have greater impacts on vegetation within the marsh. There is no standard threshold for shading (e.g., in terms of number of hours/day that wetlands are shaded), and no resource agencies have the authority to regulate impacts from shading by buildings that are well outside of their jurisdiction. However, agencies and the public could comment on shading impacts during the CEQA process. We recommend that a shading study be conducted if buildings to be constructed on the site are taller than existing buildings and/or constructed closer to the edge of the tidal marsh so that the potential impacts of shading can be addressed in the Precise Plan and/or CEQA document.” (Emphasis added)

The Project places new, substantially taller, perimeter buildings and a parking structure (N8, N15 and G4) in closer proximity to Belmont Slough; therefore, an analysis is warranted to ensure there is negligible shadowing of the adjacent tidal marsh, mudflats and open waters, all important habitats for endangered species and other wildlife. Shadows from these structures could extend into areas of pickleweed, a marsh plant that is known to be intolerant of shade. Shadows resulting from the proposed taller buildings are an indirect impact of the project on the environment and must be analyzed.

The DEIR must identify and analyze shadow impacts from increased building/parking structure heights, and provide appropriate mitigation, such as reduced height or additional setbacks, as needed.

Outdoor Areas and Litter:

The Project will result in a significant increase in on-site employees, new hotel visitors, increased public use of expanded park/open space areas, and greater public use of the Project’s section of the Bay Trail. Food scraps left in any outdoor areas of the Project and garbage/recycling receptacles without secure lids could attract increased numbers of nuisance and predatory species such as crows, ravens, gulls, rats, skunks and raccoons to the detriment of endangered species and other wildlife in adjacent areas of Belmont Slough. How would this impact be mitigated?

The Project could result in a significant increase in litter that would pollute the tidal marsh and waters of adjacent Belmont Slough, impacting wildlife in the immediate area, as well as other wildlife as it gets carried with the tides and currents to additional locations in San Francisco Bay. What mitigation measures would be put in place to ensure that the Project does not generate an increase in the amount of litter entering Bay tidal marshes and waters, either from the actual Project site or from increased use of the Bay Trail?

These potentially significant impacts should be addressed in the DEIR, and effective and enforceable ongoing mitigation measures must be provided, as well as identification of the entity responsible for ensuring mitigation measures are enforced.

Alternatives

CEQA requires environmental impact reports to identify and analyze alternatives to the proposed Project that can reduce environmental impacts. From comments we have heard at numerous public meetings, it is apparent that the Project's significant increase in size over the existing life science campus has generated well-documented and serious community concerns about the future integrity of the landfill, building height and mass, construction noise and vibration, the lengthy construction interval and traffic.

Providing that any new construction would not compromise the integrity of the landfill under existing and reasonably foreseeable future conditions, a number of alternatives should be identified in the DEIR that minimize these impacts, and provide multiple options for consideration between the defined Project and the No Project Alternative.

CCCR recommends that all alternatives considered:

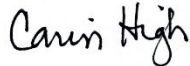
- 1) Scale back the size, height and number of buildings and parking garages in the Project to significantly reduce impacts on the community from construction noise and vibration, the lengthy construction interval and traffic.
- 2) Pull back the buildings and the parking structure (N8, N15, G4) further from Belmont Slough, or reduce the height, to avoid shadow and light impacts on the tidal marsh habitat and help minimize construction noise and pile-driving vibration impacts on wildlife.
- 3) Create an opportunity to implement an RSAP "natural and nature-based" SLR adaption measure by pulling the new levee and Bay Trail back from the Project property line wherever possible along Belmont Slough, which could avoid levee incursions into jurisdictional wetlands (toe of the new levee above HTL) and provide for some SLR marsh migration and additional high tide refugia on the outboard levee slope areas.
- 4) Add a restoration component to the Project's new flood protection and Bay Trail levee by removing the existing invasive ice plant on Project and State land and restoring "high marsh" vegetation and other native plants along this section of Belmont Slough through a collaborative effort with the California Department of Fish and Game.

Thank you for the opportunity to provide comments. Please notify us of any future opportunities for public review and comment on the proposed Redwood Life Precise Plan.

Best regards,



Gail Raabe, Co-Chair



Carin High, Co-Chair

Cc:

OneShoreline, Len Materman
OneShoreline, Summer Bundy
U.S. EPA, Lisa Valiela
USACE, Katerina Gallacatos
USACE, Julie Beagle
SFBRWQCB, Tahsa Sturgis
SFBRWQCB, Elizabeth Morrison
SFBRWQCB, Keith Lichten
BCDC, Steve Goldbeck
BCDC, Katherine Pan
USFWS, Joseph Terry
USFWS, Jana Affonso
CDFW, Tami Schane
CSFW, Garrett Allen
CDFW, John Krause
NMFS, Alison Weber-Stover
NMFS, Gary Stern

Attachment 1: Technical Memorandum: Former Landfill-Redwood Life Project, Paul Nuti, P.E.

Attachment 2: Pacific Shores Center Tree Suitability Index

Attachment 1

Technical Memorandum: Redwood Life Precise Plan Project at the Former Westport Landfill –
Scoping Comments for the Environmental Impact Report
Paul M. Nuti, Veritas Environmental Consulting, Inc., September 20, 2025

Attachment 2: Pacific Shores Center Tree Suitability Index

LSA

FS/DFS	ADMIN	CVPIA	EC	ESD	HC	WR
Tree Suitability Index						
FILE						

LSA Associates, Inc.

Environmental Analysis
Transportation Engineering
Biology and Wetlands
Habitat Restoration
Resource Management
Community and Land Planning
Landscape Architecture
Archaeology and Paleontology

June 11, 1998

Principals

Rob Balen
Sheila Brady
Lei Card
David Clore
Steve Granholm
Richard Harlacher
Roger Harris
Art Homrighausen
Larry Kenning
Carolyn Lobell
Bill Mayer
Rob McCann
Rob Schonholz
Malcolm J. Sprout

Associates

Deborah Baer
James Baum
Connie Calica
Steven W. Conkling
Ross Dobbertsen
Gary Dow
Richard Evickson
Kevin Fischer
Clint Kellner
Laura Laffler
Bevson Lee
Judith H. Malamut
Sabrina Nicholls
M. W. "Bill" O'Connell
Anthony Petros
Lynette Stanchina
Jill Wilson
Lloyd B. Zola

Dan Bufford
Endangered Species Division
U.S. Fish and Wildlife Service
3310 El Camino Avenue, Suite 130
Sacramento, CA 95821

Subject: Pacific Shores Center, Corps File No. 16783S41, Amendment 2

Dear Dan:

As requested in our telephone conversation of June 11, the following additional conditions will be added to clarify and amend the February 1998 Mitigation and Monitoring Plan for the above referenced project. These issues address your request for leash requirements for dogs, mitigation for reduced project buffer, and acceptable landscaping trees.

Section 4.2.1 Buffer Zones and Screening (page 4-3 to 4-5). Appropriate language and/or additional signs will be added to the public access trail to remind trail and other open space users of leash requirements for dogs within open space areas.

Section 4.2.1 Buffer Zones and Screening (page 4-3 to 4-5) and Section 4.1 Goal of Mitigation (Page 4-2 and 4-3). As was discussed in our June 8, 1998 letter, we were only able to practically provide an 85-foot buffer/setback between the trail and the adjacent salt ponds. The 15-foot difference between the available buffer and the requested 100-foot wide setback equates to approximately 1 acre. As mitigation for the reduced buffer, the applicant will provide 22 acres of compensatory wetland restoration as proposed in the mitigation plan. The additional 1 acre of mitigation is included within the proposed 22 acres and balances the impact and mitigation requirements resulting from the ratio calculation error on page 4-3. The revised calculation on page 4-2 and 4-3 will now read:

A 2:1 ratio is proposed for the fill/loss of 7.1 acres of potentially suitable salt marsh harvest mouse habitat (14.2 acres) and 1: 1 replacement is proposed for the 6.8 acres of the highly degraded wetlands Seaport Boulevard, the roadside ditch, the four outfall locations on non-native soil /fill material on the development site (6.8 acres), and the approximately 1 acre

06/28/98\H:\STEVE\FILES\NSC830\BUFFORD\

157 Park Place
Pt. Richmond, California 94801

Telephone 510 236-6810
Facsimile 510 236-3480
E-mail lsa2@aol.com

Other offices located in Berkeley
Irvine, Riverside and Sacramento

of land within the reduced width perimeter buffer between the site and adjacent salt ponds (1 acre)/(22 acres total).

Section 4.4.2 Project Landscaping (pages 4-4 to 4-9).

Only high landscape suitability trees will be used for project landscaping. The following trees on the initial plant palette landscaping suitability index meet the Service's criteria based on your facsimile of June 11, 1998:

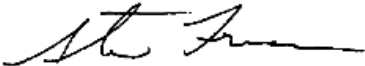
<i>Acacia baileyana</i>	<i>Cercis occidentalis</i>	<i>Crataegus phaenopyrum</i>
<i>Feijoa sellowiana</i>	<i>Geijera parviflora</i>	<i>Melaleuca nesophila</i>
<i>Schinus terebinthifolius</i>	<i>Cycas revoluta</i>	

As we discussed, some of the Service's suitability changes were in response several apparent discrepancies in tree height between our source, *The Western Garden Book* and your source, *Hortis Third*. Herma Lichtenstein, the project landscape architect, indicated that *Hortis Third* provides information on tree height and growth under ideal conditions (i.e., in the tree's natural habitat/climate). *The Western Garden Book* on the other hand addresses the height and growth form on what is more normal for this region. Actual tree heights will likely be lower at the project site given the local wind and salt spray conditions at this site.

I believe this addresses the items we discussed. If you have any questions or wish to discuss other measures to address the setback issue, please feel free to contact me.

Sincerely,

LSA ASSOCIATES, INC.



Steve Foreman
Project Manager/Wildlife Biologist

cc Peter Brandon
John Sanger
Mark D'Avignon

LSA

FS/DFS	ADMIN	EC	ESD	FILE	WR
FILE					

LSA Associates, Inc.
 Environmental Analysis
 Transportation Engineering
 Biology and Wetlands
 Habitat Restoration
 Resource Management
 Community and Land Planning
 Landscape Architecture
 Archaeology and Paleontology

April 28, 1998

Principals

Rob Balen
 Sheila Brady
 Les Card
 David Clore
 Steve Granholm
 Richard Harlacher
 Roger Harris
 Art Hamrighausen
 Larry Jennings
 Carolyn Lubell
 Bill Mayer
 Rob M. Cann
 Rob Schonholz
 Malcolm J. Sprout

Associates

Deborah Baer
 James Baum
 Connie Calica
 Steven W. Conkling
 Ross Dobbertzen
 Gary Dow
 Richard Erickson
 Kevin Funcher
 Clint Kellner
 Laura Lufker
 Benson Lee
 Judith H. Malamut
 Sabrina Nicholls
 M. W. "Bill" O'Connell
 Anthony Petros
 Lynette Stanchina
 Jill Wilson
 Lloyd B. Zola

Dan Bufford
 Endangered Species Division
 U.S. Fish and Wildlife Service
 3310 El Camino Avenue, Suite 130
 Sacramento, CA 95821

Subject: Pacific Shores Center, Corps File No. 16783841

Dear Dan:

Enclosed is the preliminary tree species plant palette for the Pacific Shores Center Project for your review. The plant list was initially supplied by Merrill and Belfu, the project's landscape architectural firm. We have analyzed the list with respect to the landscaping suitability criteria described in Section 4.2.2 on pages 4-7 to 4-9 of the February 1988 Mitigation and Monitoring Plan. As described in the mitigation and monitoring plan, only trees falling into the moderate to high suitability index values would be used for project landscaping. High index value trees would be used for general landscaping. Moderate suitability trees would be used in specific locations such as the screening barrier on the western edge of the site where taller trees are required as mitigation for other environmental affects.

The applicant has also proposed to fund regular monitoring and to implement control measures to eliminate specific problems should such conditions arise in the future (see Section 4.2.3, pages 4-9 to 4-10 of the plan). If you have any questions or require additional information, please feel free to contact me.

Sincerely,

LSA ASSOCIATES, INC.



Steve Foreman
 Project Manager/Wildlife Biologist

Enclosure

04/28/98(H:\STEVE\FILES\SC\BUFFORD)

177 Park Place
 Ft. Richmond, California 94801

Telephone 510 236-6810
 Facsimile 510 236-3480
 E-mail lsa2@pacnet.com

Other offices located in Berkeley
 Irvine, Riverside and Sacramento

Pacific Shores Center
Suitability Analysis for Preliminary Landscape Palette
Relative to Minimizing Raptor and Raven Nesting Suitability

Tree Species	Tree Characteristics ¹	Landscaping Suitability Index ²
<i>Acacia baileyana</i> Bailey acacia	20-30 feet; round form; closed dense crown	High
<i>Casuarina stricta</i> Drooping she-oak	20-35 feet, oval to dome shaped crown, upright fine branches	Moderate to High
<i>Casuarina cunninghamiana</i> River she-oak	to 70 feet; oval to dome shaped crown; crown with large branches and openings	Low
<i>Cedrus deodara</i> Deodar cedar	to 80 feet; pyramidal crown, large horizontal limbs	Very Poor
<i>Cercis occidentalis</i> Western redbud	10 to 18 feet; irregular crown; small upright limbs	High
<i>Cornus nuttallii</i> Western dogwood	to 50 feet; irregular crown; small limb structure; some openings in canopy at maturity	Moderate
<i>Cornus florida</i> Eastern dogwood	to 20 feet; irregular shape with fine horizontal branches to 40'	High
<i>Crataegus phaenopyrum</i> Washington hawthorn	to 25 feet; fine limb structure, spreading crown	High
<i>Cupaniopsis anacardioides</i> Carrot wood	to 40 feet; dome shaped form	Moderate
<i>Cupressus arizonica (glabra)</i> <i>pyramidalis</i> Arizona cypress	to 40 feet; oval, dense compact crown	High to Moderate
<i>Cupressus sempervirens</i> Italian cypress	to 60 feet; dense, narrow columnar form; upright fine branches to 80'	High
<i>Eucalyptus citriodora</i> lemon-scented gum	75 - 100 feet; irregular, open crown	Very Poor
<i>Eucalyptus ficifolia</i> Red flowering gum	to 40 feet; round-headed tree; compact crown	Moderate
<i>Feijoa sellowiana</i> Pineapple guava	18 to 25 feet; round to spreading form; dense crown	High
<i>Fraxinus ornus</i> "Raywood" Raywood ash	25 to 35 feet; compact, round headed crown; generally small narrow limbs to 60'	High
<i>Geijera parviflora</i> Australian willow	25 to 30 feet; dome shaped crown, with small upswept branches	High
<i>Gleditsia triacanthos</i> Moraine locust	35 to 70 feet; spreading, arching branches; open crown	Poor to Low
<i>Koelreuteria paniculata</i> Goldenrain tree	20 to 35 feet; spreading form with open branching crown	Low to Moderate
<i>Laurus nobilis</i> Sweet bay	12 to 40 feet; compact, broad-based, multistemmed cone-shaped crown	High

Tree Species	Tree Characteristics ¹	Landscaping Suitability Index ²
<i>Liquidambar formosa</i> Sweet gum	to 25 feet; generally dense cone to pyramidal shaped crown <i>to 120'</i>	High
<i>Lyonothamnus floribundus</i> Catalina ironwood	30 to 60 feet; 20 to 40 foot dome-shaped spread	Moderate
<i>Melaleuca neophila</i> Pink melaleuca <i>Melaleuca</i>	15 to 20 feet, occasionally 30 feet; irregular to round dense crown; can develop heavy gnarled branches if unpruned; branches generally upright	High
<i>Melaleuca quinquenervia</i> Cajuput tree	20 to 40 feet; upright, open dome to round crown	Moderate to Low
<i>Nyssa sylvatica</i> Sour gum	30 to 50 feet, pyramidal when young to spreading at maturity; short horizontal branches	Poor
<i>Olea europea</i> European olive	25 to 30 feet; vase shaped;	Moderate to High
<i>Pinus canariensis</i> Canary island pine	60 to 80 feet; pyramidal when young to round crown at maturity; large open branches	Poor
<i>Pittosporum crassifolium</i>	to 25 feet; dense dome to round crown <i>to 35'</i>	High
<i>Podocarpus gracilior</i> Fern pine	to 60 feet; oval crown with heavy dense foliage	Low to Poor
<i>Populus nigra</i> Lombardy poplar	40 to 100 feet; dense columnar shape with upward reaching branches	Poor to Very Poor
<i>Pyrus calleryana</i> Bradford pear	25 to 50 feet; dense, round crown; horizontal branches	Moderate
<i>Quercus agrifolia</i> Coast live oak	20 to 70 feet, open round to spreading crown; large horizontal branches	Poor
<i>Schinus terebinthifolius</i> Pepper tree	to 30 feet; broad, umbrella-shaped crown; dense foliage	High
<i>Ulmus parvifolia</i> Chinese evergreen elm	40 to 60 feet; spreading with long, arching to weeping branches	Moderate to High
<i>Umbellularia californica</i> California bay	20 to 25 feet in cultivation; dense foliage	Moderate to High (if kept low)
<i>Cycas revoluta</i> Sago palm	<i>trunk</i> to 10 feet	High
<i>Syngus (Arecastrum) romanzoffianum</i> Queen palm	to 50 feet; dense growth of feather-type fronds	Moderate
<i>Washingtonia robusta</i> Mexican fan palm	to 100 feet	Moderate to Poor

¹ Source: Sunset Western Garden Book. 1988. Lane Publishing Co., Menlo Park, California

² **Landscaping Suitability Index**

Trees must possess at least two of the specified characteristics in order to fall within a designated index value. All characteristics refer to trees at maturity. Trees with high landscaping suitability have low potential for raptor and raven nesting and roosting where as trees with poor or very poor landscaping index values have high potential for raven and raptor nesting and roosting.

High: 20 to 25 feet or less in height; columnar shape; preponderance of fine limbs; or closed dense crown structure.

Moderate: 25 to 50 feet in height; moderate arch in limb structure; or crown with openings consisting of 20 percent on the crown area.

Low: 50 to 70 feet in height; fairly horizontal limbs structure; limbs 3 to 5 inches in diameter at trunk; or crown openings of 20 to 30 percent.

Poor: 50 to 70 feet in height; fairly horizontal limb structure; limbs > 8 inches in diameter at trunk at > 50 feet in height; or 50 percent crown area open.

Very Poor: > 70 feet in height; horizontal limb structure; limbs > 8 inches in diameter at trunk at > 50 feet in height; crown structure > 50 percent open; or good potential for sentinel perches > 70 feet high from nearby trees.