

Comments on NOP for Cargill/DMB Saltworks Project

General Comments

The project as proposed does not conform to the 2009 California Climate Adaptation Strategy for the State's own facilities. It says, "State agencies should generally not plan, develop, or build any new or significant structure in a place where that structure will require significant protection from sea-level rise, storm surges or coastal erosion."

The Saltworks/ DMB proposal is not currently incorporated within the recently adopted Redwood City General Plan and an amendment will require Council approval along with Zoning Code changes. The Redwood City long term General Plan includes 2500 residential units in the downtown area, 500,000 new office space 100,000 new retail space and a 200 room hotel. Redwood City's overall projections for the next 15 year includes 6439 units with 1856 affordable units.

The fact that the various plans above for land use, housing, water, transportation, etc. did not anticipate this level of development, there a number of issues/amendments to these plans that need to be considered. Not the least is WHERE development would occur, and at what intensity, and then, are there resources to support this level of development, or to mitigate the impacts.

Land Use

Redwood City 's General Plan approved in April, 2010 states "Due to the sensitive nature of these open-space areas, it should be assumed that they will remain as open space." It was understood that the applicant would need to make the case for an amendment.

The Saltworks Proposal conflicts with Redwood City's overall development plan. Saltworks plans to build 12,000 housing units coupled with 1 million sq ft of commercial office space containing 4.400 employees and retail stores. An analysis should consider the potential impacts on the cohesiveness and quality of the greater community as a result of extending development as proposed. Wetlands/tidal plains serve to protect the adjacent lands from flooding. If a seawall is constructed around the Saltworks development will this increase the risk of flooding and water pollution on the adjacent properties including the Port and E. Bayshore Blvd.?

Greenbelt Alliance has estimated that there are 40,000 potential infill sites between South San Francisco and San Jose. Redwood City's Plan includes the use of infill sites to develop approximately 5,000 units of affordable housing, a sizeable amount to be set aside as rentals. Redwood City plans to complete their downtown development with the addition of 2500 residential units, 500,000 sq. ft of office space and 100,000 sq.ft of shops plus 200 hotel rooms. They have sufficient infill sites for future mixed use housing sites along transportation corridors to reach the 2014 objective.

The impact of No Project would mean that the cities along the Peninsula would continue to develop workforce housing utilizing infill opportunities within their cities, as outlined by the ABAG 2009-2014 projections. Redwood City would continue with their General Plan developed last April.

How many people are projected to work in the commercial offices and mixed use buildings?

What is the maximum building height proposed and how will that impact bay views? (Page 14)

Four elementary schools and a middle school are planned. Where will these students attend high school and how will they get there? Do existing Sequoia district schools have enough capacity to absorb the increase in student population from this development?

How many and what kind of animals will be housed at the 4H club facilities? How will the manure and manure runoff be kept out of waterways? Fecal waste from domestic animals poses serious health risks for wildlife. (Page 15)

Will the boating center be for residents only, or will it accommodate local rowing teams?

Figure 5 shows housing located separated by only a greenway from the marshland. What will prevent cats, fox and other predators from entering the marsh at this point? The EIR should address such habitat issues and comment as to the Bay storm water whether acceptable mitigation measures may be found.

Infrastructure Improvements (wetlands/etc)

Is it advisable to place 30,000 residents at risk of sea level rise, earthquake liquefaction and flooding? Redwood Shores recently added additional feet to their seawall and other types of reinforcement . These costs were paid for by the residents.

Wetlands/tidal plains serve to protect the adjacent lands from flooding. How will a seawall constructed for the Saltworks impact adjacent communities not having a seawall such as Menlo Park? Increased water volume, flood management may occur. There may be less opportunity for filtering leading to contamination.

“The site is almost entirely in a FEMA designated 100 year flood zone.” This is contrary to the goals of the 2009 California Climate Adaptation Strategy, which states that new developments within known high risk flood zones are to be avoided. (Page 20)

“Mechanical and chemical control measures (including pesticides) may be employed to manage aquatic weeds and algae.” Using pesticides/herbicides may be very effective at weed and algae management

but may be detrimental to marsh and bay flora and fauna. The EIR should address the likelihood of mitigation.

“The pump station would move water into the restored tidal marsh. A portion of the Sports field complex....would be used for supplemental storm water retention.” Marsh lands are very sensitive to pollution runoff and the influx rate of freshwater. The West Bay Sanitary District’s storm overflow ponds are located on the south side of the proposed marsh restoration. The EIR should assess how the combined storm drainage systems from WBS and Saltworks will affect the restoration and long term health of the adjacent marshlands. (Page 21)

Housing

One reason to change the General Plan and rezone to allow for the proposed project would be to meet the City’s housing goals. Therefore the EIR should assess whether the project will facilitate achievement of these goals.

The Redwood City General Plan and Housing Plan approved April, 2010, assigns the highest priority for affordable rental housing. The Saltworks project as presented doesn’t describe in detail what and where the 15% affordable housing will be. Rental vs. purchase, integrated within the 12,000 units or separate area? How will the Regional Housing needs requirement be met? (SB375)

The Redwood City Housing Plan for 2009-2014 projects development of 1,856 units with the following allocations:

very low income 23%, low income 16% moderate income 19% above moderate 42%

The highest priority for Redwood City is affordable rental housing.

How will the Saltworks/DMB pricing of units compare? Buyers for the above moderate would need to have \$150,000 yearly income. Where will the approximate 4,400 office and retail workers live ? What will be the impacts of their commute?

How will the Saltworks/DMB pricing of units compare? It’s estimated that those seeking above moderate housing would need approximately \$150,000 yearly income. Where will the approximately 4,400 office and retail workers live? What will be the impacts of their commute? The 15% affordable housing set aside in the Saltworks project is reflected in land only. What do we know about future housing development and job growth for the entire Peninsula? Would it be desirable to spread the growth regionally rather than concentrated on one area? According to planner Calthorpe “the Bay area has the largest job/housing imbalance in California.(200,000 people commute in the Bay area

everyday).According to ABAG projections the Bay area will have 1.6 million new jobs by 2035 and will need 1.3 million new homes. There's a need for target figures expressed in more local terms with a meaningful time line.

the Saltworks phased development over the next 30 years raises several questions.

What services will be available to those purchasing homes in the first phase? Which of these services are to be funded by the developer and those paid for by the residents?Schools, Emergency services, water/sewage treatment and related infrastructure,service roads, parks, fields, shuttle service, seawall maintenance, 101 pedestrian overpass, new surface road to Woodside Rd.. Community Center, wetland restoration. waste removal, A complete cost breakdown of these services over time identifying who is financially responsible for payment. It would be helpful to obtain sample figures from City Government of Redwood Shores of ongoing maintenance problems and financing. Foster City had considerable problems with underwater utilities, pumping and sewage lift stations, road and infrastructure settlement problems much of which was paid for by resident taxes. Those figures would be helpful in preparing a financial disclosure for prospective buyers.

Finally if the project is approved, we would hope here would need to be a requirement for a green and sustainable construction process.

Open Space Uses

Page 25: Recreational Open Space:

The proposed crescent shaped Bayside Park and neighborhood waterway greenbelts are designed as the primary outdoor living area for Saltworks residents since most will not have access to a private yard. "Bayside Park would be one of the larger waterfront parks on San Francisco Bay and could attract a large number of visitors." This puts a large amount of urban outdoor activity in close proximity to sensitive waterways and marshlands with a high potential of contamination by trash, pet fecal waste and chemical runoff from lawn fertilizers and pesticides.

The American Veterinary Association estimates that the typical American community has a cat population of 713 per 1000 households, and a dog population of 632 per 1000 households. So, in the proposed Saltworks community of 8000 to 12000 households, expect about 7000 cats and 6000 dogs. The endangered harvest marsh mouse and clapper rail have been documented in the proximity of the proposed development site. Domestic cats are natural predators of both mice and birds. Studies have shown that when cats are in the vicinity of shorebird nesting sites, shorebird populations decrease. Other studies have shown that the presence of dogs, even on leash, can frighten shorebirds into abandoning nests and that the extra energy expended in fleeing the perceived danger can cause death in shorebirds. There is no practical way you can forbid residents from owning pets in this development, or from allowing those pets to use the public open spaces.

The AVA has found that cats generate about 20 pounds of poop per year. Feline fecal matter is typically contaminated with organisms that have been shown to infect bivalves and consequently cause illness and death in sea otters that feed on the infected bivalves. Does the same apply to harbor seals which are present in bay waters near this site? What do you plan to do to prevent contamination of the bay waters with fecal matter from pets that could infect fish, aquatic animals and birds?

How do you plan to keep fertilizers, pesticides and trash out of the waterways and baylands? How will you monitor the waterways to ensure that they are free of contaminants and safe to use for boating and shoreline activities? Do you expect that people will be able to wade into the water; if not, what will prevent them?

The restored marshlands will be downwind of the development, so any litter dropped in the development will blow toward the marsh. Trash bins at school grounds, parks, businesses and homes will need to be emptied, and often some litter gets caught in the wind while the bins are being emptied. What will be done to ensure that all the trash ends up collected and properly disposed of? Who will be responsible for cleaning litter out of the open spaces and waterways so that none ends up in the marsh or bay?

Restoration Open Space

Saltworks promotional materials published in local newspapers claim that the private restoration plan of these 436 acres of marsh land will be completed in less time and for less money than other bay area restoration plans. According to the California Coastal Conservancy, the costs of bay area restoration projects has varied from a low of \$2k/acre for former salt pond restoration to a high of \$75k/acre for the Hamilton airfield restoration which involved hazardous material removal and subsidence remediation. The Bair Island restoration which is currently in process is costing approximately \$8k/acre. The Saltworks project involves converting former salt ponds to marsh, so it is to be expected that the remediation costs would be on the lower end of the spectrum. The San Francisco Bay National Estuary Research Reserve has found that marsh restoration is more successful if completed slowly; wetlands with fully developed ecosystems take time. At what point during the estimated 20-30 years that it is expected to take to develop the Saltworks site is the developer planning to begin wetland restoration? How long is it projected to take and at what cost per acre? What will be the condition of the wetland when the developer finishes working on restoration and who will take over the ongoing monitoring and study of the wetlands to ensure the project's ongoing success? Who will pay for that ongoing maintenance? Will Cargill set up an endowment to pay for the expenses of maintaining the levees, waterways and marshlands, will the burden of ongoing maintenance costs be placed on residents of the development, or will taxpayers pick up the expense?

Saltwater marshlands are one of the most effective ecosystems for sequestering carbon. They may be even more effective at sequestration than trees ("White paper on Carbon Sequestration and Tidal Marsh Restoration", Lynn Trulio et al, 2007). Marshlands continue to build up and are able to keep up with sea level rise as long as there is a sufficient amount of sediment flowing into the salt marsh. Salt marshes

also provide flood control by acting as sponges for excess storm water. Please compare the impacts on air and water quality, flood control and greenhouse gasses of building the Saltworks 50/50 plan versus restoration to salt marsh of the entire Cargill parcel and building in known urban infill locations in the downtown area of Redwood City.

Transportation and Circulation

Reducing or replacing long distance commutes and other uses of motor vehicles are potential benefits of new high density housing and commercial/office development. The EIR should assess whether or not the project is likely to bring such benefits.

The initial study of the proposed project has identified significant land use impacts, including those associated with traffic and transportation. By extending urban development beyond current urban limits, with resulting traffic impacts, the project could adversely affect the cohesiveness of existing communities, and especially Redwood City. This is **not** an infill development and **does not** concentrate development along existing transportation corridors.

All of the items listed in Section 7.16, page 72, in the Notice of Preparation, related to traffic, have potentially significant impacts. If adequate mitigations cannot be provided, the development project should not proceed.

The Alternatives Analysis needs to examine alternatives that **do** concentrate new development in already identified infill locations along established transportation corridors, particularly the Caltrain line and El Camino Real. The analysis must include traffic and economic impacts on the Grand Boulevard initiative that is included in Redwood City's future planning.

The ten Transportation Plan Objectives and the seven Transportation Plan Strategies listed in Attachment B, 10/16/09, must provide details that will demonstrate that internal transportation needs will be adequately met and that feasible and adequate connections can be made from the isolated site to other transportation systems. If these proposals cannot adequately mitigate the potentially significant impacts of the development, the project should not proceed.

Since none of the currently existing transportation models used by the county and the city are fully applicable to the proposed project, a new travel demand forecasting model, consistent with the Redwood City General Plan, must be developed to analyze the changes in travel patterns that will result from the addition of the project traffic to other systems, locally and regionally. This must include a rigorous estimate of vehicle trip generation by workers entering and leaving the project, trips by high school students, goods movement, transit ridership, and mode shifts. The consultant's preliminary estimates of travel demand show that the development would generate between 60,000 and 70,000 daily trips and between 6,000 and 7,000 peak hour trips. The distribution of these trips to local and regional systems already operating at or above capacity would be a potentially significant impact; the project should not proceed if these impacts cannot be mitigated.

Circulation Plan

“The goal of the *Saltworks* circulation plan is to connect neighborhoods together both within the Project as well as surrounding areas.” “The circulation system would be composed of a Perimeter Boulevard, Transit Boulevard, and internal roads.” Vehicular access to Perimeter Boulevard would be at Marsh Road at one end and Blomquist Street extended to Whipple Avenue at the other end. Blomquist Street connects to Woodside Road/Seaport Boulevard; the Woodside Road/101 interchange is one of the most congested in San Mateo County, with peak hour traffic at LOS F. The plan includes a new bridge across 101 to connect to Broadway, but it would not accommodate vehicular traffic. Thus, there are effectively only two entries/exits along the Perimeter Road for the entire length of the development.

Lack of access to the development is a potentially significant impact. This could be an extremely dangerous situation in the event of a disaster, such as an earthquake, when levees could be breached or destroyed and it might be necessary for residents and workers to exit quickly and for emergency vehicles to enter the project area using only those two primary access roads. With only one fire station to serve a community with a population similar to that of Menlo Park, and also one million square feet of commercial space, five schools, and several other facilities, access to the underserved project area is critically and dangerously limited. How can lack of access be adequately mitigated?

Early plans for the new bridge across 101 included vehicle traffic. The city’s concern that traffic may use the new bridge to travel between the city and the development through city neighborhoods, on streets not designed to accommodate additional vehicular traffic, must be analyzed. An analysis must also be done on whether the elimination of vehicle traffic providing improved safety for pedestrian and bicycle traffic is offset by safety problems caused by the increased vehicle traffic on the other routes in and out of the project. The analysis must include projections of traffic entering and leaving the development at either end, and congestion levels at midday and at peak times, both northbound and southbound.

An Intelligent Transportation System (ITS) is proposed to be integrated within the *Saltworks* grid, connected to Redwood City networks and the Caltrans ramp metering system. The proposal must say who will have responsibility for construction of these features and who will pay the ongoing expense of maintenance and monitoring. This must be answered.

Transit Plan

The project proposes to construct the onsite segment and an offsite segment, on the new crossing over 101, of a transit system that could connect with a transit system built by the Redwood City. The system “would be phased into operation,” but no schedule is provided for construction of the segments. There is no plan for the developer to connect the project to downtown Redwood City or to make a connection to Caltrain; Redwood City is expected to make that connection for those living and working in the project area. This does not provide the needed transit connectivity between the project and the places to which it should be linked. Of ten connections listed in the Statement of Justification (page V-54), only the connection from the project to the Stanford/Midpoint area will be provided for by the project; the other nine are dependent on transit construction by Redwood City.

Transit ridership estimates must be developed and substantiated against the many variables that will affect the system, both internally and when connected to the city system. Ridership estimates should be prepared as part of the model that will be needed for studying all traffic impacts of the project. Will there be sufficient linkage to external transit systems, what will be the cost effectiveness per trip, is the proposed system financially feasible, will the transit ridership sufficiently reduce VMT and GHG to meet the project's goals?

The public private partnership necessary to develop effective transit connectivity is described only in vague, general terms. Specific information is essential in order to evaluate the proposal. Either a rail or rubber tire system is costly to build, maintain, and operate. The connection from the project across 101 requires the involvement of several agencies and taking of some already developed property. These factors affect when and how the transit system could begin to provide the external connection. A plan must be provided to show how and when these factors will be accomplished.

Transportation Demand Management Program (TDM)

A well designed and managed TDM program and its associated Transportation Management Association (TMA) is essential to the success of the project transportation plans in order to reduce single occupancy vehicle trips and to reduce potential greenhouse gases and congestion both within and external to the project. The marketing devices described are standard practices. What mechanisms and commitments will be included in the development agreements to fund, operate, and maintain the necessary components of the program?

These concerns are brushed aside in Attachment B, where it says, "Most TMAs are funded through dues paid by member businesses and government grants," but suggests that a not-for-profit corporation be established, funded by property assessments, and later, by "additional voluntary memberships" by others outside the project who might want to attract employees from among the project residents. **This is a totally inadequate approach to establishment, management, and funding of the TMA.** The variety of services to be provided and the funding mechanism must be part of the development plan, part of the upfront, buy-in cost of doing business in the project, and not dependent on unknown future participation by others.

Associated with the possible 30-year period for build-out of the project is the fact that there is no certainty about when the TDM and the TDA programs would be initiated and in which order the elements of the programs would be put in place. However, mitigations for traffic impacts must be detailed, in accord with Redwood City's General Plan Policy BE-31.5, which requires "that TDM programs initiated by private parties reduce projected traffic impacts."

Parking Management

An essential feature of any commercial and/or residential development is provision of parking for employees, residents, and visitors. Limiting parking is an effective means of encouraging use of transit, carpools, car sharing, bicycles, and pedestrian walkways, and will help to reduce greenhouse gases caused by the development. Any parking provided should recover its cost and maintenance through

user fees priced to encourage alternative mode shifts, and unbundled from land uses. The cost of parking must be borne by all users, including commercial, retail, residents, employees, and visitors. All ten of the parking components described in the Statement of Justification and Attachment B must be firmly established through permitting and development agreements, and the mechanisms for these must be detailed in the Environmental Impact Review process. Management agreements need to be established at the outset and be written to include all future development, both commercial and residential.

Alternative Modes of Transportation

The modes described are Bike/Walk and Electric Car Share and Lease to Own. The proposal uses vague language, such as, “anticipates....a partnership with a car share vendor,” “may be in a position to purchase NEVs.” This traffic mitigation measure must define specific management plans and financial arrangements to provide alternative modes of transportation.

Conformity to Local and Regional Plans

The EIR should assess the potential of the project to assist or to impede the achievement of local and regional plans including regional GhG reductions and local/regional housing, transportation, open space and natural resource conservation/restoration plans. Regional plans explicitly call for housing/job/transportation efficiency, transit-oriented design of projects and greenhouse gas emission reductions via land use and transportation under SB 375.

Regional Plan Compliance and Concerns

Because the League of Women Voters is active both at the local level and at the Bay Region and State level, we do want to be assured that the EIR addresses the conformance with existing regional plans, as well as the latest proposals for One Bay Area.

BCDC

Regional Housing

Regional Vision

Grand Boulevard

The EIR should assess the potential of the project to assist or to impede the achievement of local and regional plans, including regional GhG reduction and local/regional housing,

The project will affect numerous Policies established by Redwood City in its recently adopted General Plan. These Policies would have to be revised to accommodate the development, and/or extensive mitigations would be required to allow the development to be built on the Saltworks site. If identified

potentially significant impacts cannot be mitigated, the project should not be approved. Acceptable levels of risk must be identified and quantified for each Policy.

Specifically:

Goal PS-5, Policy PS-5.2, Land Use – “Discourage development on land vulnerable to flooding from sea level rise where potential impacts cannot be adequately addressed.”

Goal PS-9, Policy PS-9.1 applies to emergency plans for bayfront levees and highway structures.

Goal PS-14, Policy PS-14.I, transportation-related noise impacts will have to be mitigated; Policy PS-14.5, funding will be required to monitor noise levels and investigate noise complaints.

Goal BE-25, Policy BE-25.4 will require the developer to establish mitigations for impacts on overall mobility and various travel modes; Policy BE-25.6 will need to be enforced to require the developer to establish an adequate impact fee program to transportation improvements. However, new development is contrary to the policy of less dependency on new transportation infrastructure.

Policy BE-26.8 and Policy BE-26.25 must be strongly enforced for this development so that during and after build-out, there will be sufficient funding for maintenance of facilities for alternative modes of transportation.

Goal BE-27, Policy BE-27. and Policy-27.8, about shuttles, should be considered as an alternative to creating a bus or rail transit system, particularly during the early phases of the project when use of large transit vehicles would not be cost effective.

Goal BE-30 and all of its Policies relating to goods movement are critically important to the Saltworks development. If these Policies cannot be adequately and safely fulfilled, the development should not be built.

The project must also conform to San Mateo County’s Countywide Transportation Plan 2035 (CTP 2035), which aims to provide “An integrated transportation system ... that is cost-effective, sustainable, and equitable, ... by providing travel choices, enhancing community livability, preserving environmental quality, and promoting traffic safety.”

Element 7, Land Use and Transportation Linkage, calls for concentration of new development, with higher density residential, employment, and mixed-use development near transit stations and along major bus corridors, with redevelopment of cities along the Caltrain and BART systems. Development standards must minimize traffic generated that will spill out onto County highways. Parking management programs should reduce resources used for parking. Transit-oriented development should help to implement the Grand Boulevard Initiative. *This development is not transit-oriented and is not along the Grand Boulevard, so will not be able to fulfill this policy.*

Element 8, Motor Vehicle Travel, calls for adequate funding for maintenance of local streets and roads; the developer must provide means to reduce the amount of motor vehicle travel.

Element 9, Bicycling, encourages bicycling by use of a comprehensive network to reduce reliance on the automobile. This will be aided by providing bicycle lockers and racks, and by establishing bicycle sharing programs.

Element 10, Walking, prioritizes safety, addresses mobility needs of walking-dependent populations, and encourages walking as a commute mode. *The needs of senior citizens and school children are not mentioned in the proposal.*

Element 11, Public Transit, establishes transit preference in key corridors and station areas, recognizing the role of integrated, supportive land use to ensure that the system is cost-effective. Transit service costs are measured in costs per passenger, mile, and hour.

Element 12, Transportation System (TSM) and Transportation Demand Management (TDM), lists five policies important to provide effective TSM and TDM. One tool is traffic adaptive signal control. Will the project include this?

Element 13, Intelligent Transportation Systems (ITS), **emphasizes** “Deployment of ITSs ... for Traffic Management, Public Transportation Management, Parking Management, and Traveler Information Applications.” ITS has to be an important aspect of the mitigations for traffic generated by the development.

Element 14, Parking, includes a policy to encourage “...emplacement of solar panels on parking lots and structures...” to create new sources of renewable energy. This needs to be a prominent feature of the development.

Element 15, Modal Connectivity, defines policies to integrate all modes of transportation within *and to/from San Mateo County*. Since *Saltworks* expects that people will come from outside the project to work there, and that residents of the development will travel to jobs elsewhere, these policies are important to establishing transportation initiatives within the development and to make connections outside the development.

Element 16, Goods Movement, addresses factors that will be critical to the development and mitigations necessary for potentially significant impacts related to already established transportation routes used for goods movement important to the economy of Redwood City and the region.

Element 17, Environment, recognizes that San Mateo County must work toward “A Clean and Green Transportation System...” Important to this is adaptation to anticipated climate change effects, which includes “Discourage transportation facility investments in areas subject to inundation due to future sea level rise.” Also important is to provide electric re-charge facilities and to increase use of non-motorized modes of travel, as described above.

Water and Flood Issues

Global climate change is expected to aggravate water shortages and flooding in California, as well as causing sea-level rise. The EIR should take these problems into account.

Water Supply

It is indicated in the Water Group summary that there are feasible options that would meet or exceed Saltworks project demands. These primarily include the opportunity to import new potable water sources, and maximize the use of recycled water for landscaping, commercial and industrial use. This does not rely on desalination, groundwater wells, rainwater and /or greywater collection, due to the cost, potential water quality and subsidence/liquefaction, or just the lack of supply reliability.

Of the two primary options, we would ask for a more thorough evaluation of the current status. Redwood City has exceeded its allocation from the San Francisco Hetch Hetchy system for a number of years, and has managed to have enough water by purchasing “shares” from other SF water users. In addition, BAWSCA estimates that there will be a limit to the amount of water that SF PUC can provide and it is pursuing additional long term supplies, of roughly 20% of the demand. BAWSCA agencies are also actively implementing conservation methods, but there will be a limit to how much more can be saved in the future.

The option for Saltworks to purchase Nickel water from first water rights of the Kern River for 35 years, with a 35 year extension, may be feasible, and not diminish the flow of water within the California Aquaduct below the Delta pumps, but who can predict what solutions will be proposed or implemented to the surface water distribution system (esp. within the Delta and on through the San Joaquin Valley) over the next 50-100 years. Perhaps some agency has done a “risk analysis” on the future of water needs and surface supplies.

Secondly, the maximized reliance on recycled water for non-potable uses raises some questions. In presentations we have heard by Redwood City officials, the way that the recycled water works, particularly in Redwood Shores landscaping and other non-potable uses, is by the use of the SBSA water treatment facility which is located in Redwood Shores. The Saltworks property is well south of the treatment plant, and it would seem that extensive /expensive piping would be needed. To date this has not been feasible for the rest of Redwood City, so the EIR should determine whether this a realistic option for reducing potable water demand.

Finally, inasmuch as the population growth and demand for water within this project was not anticipated in the Urban Water Management Plan (this is a very large new demand), the outcome of the current update should provide some perspective.

Greenhouse Gas Emissions

In particular, potentially significant impacts are identified by the generation of greenhouse gas emissions, which may exceed the BAAQMD thresholds. Emission limits pursuant to AB 32 may also be a factor – as well as the question of whether the project proposal is the best solution within these regulations. As well, we would be looking to compliance with the Redwood City’s adopted Community Climate Action Plans. All of these are an integral part of the Bay Area’s attainment of the Regional Target of greenhouse gas reductions by 2020 and beyond

The land use question may be defined as a green house gas generation issue. Is it more efficient and sustainable to utilize existing infill properties along the Peninsula main corridors to build work force housing as required by the ABAG Housing projections for 2009-2014 or to create a new city of 12,000 homes adjacent to Redwood City requiring some new filling of the Baylands and infrastructure? An example is the projected 223 acres of streets.

Redwood City currently has sufficient infill sites for future mixed use housing along transportation corridors from San Francisco to San Jose, it would seem environmentally sound to recycle infill property along existing corridors.

The EIR should estimate the projected GhG emissions of the project versus the no project, which means the Saltworks proposal vs. the same amount of housing, commercial space via dispersed infill housing, commercial and infrastructure. We believe models are available to make these calculations.

SB 375 and One Bay Vision

3. For greenhouse gas reduction (GHG) transit-oriented and cutting VMT (vehicle miles travelled) are the biggest impacts.

4. The levee has to be for certain and funded for whatever is needed and perhaps expanded to protect all of Redwood City (or even to give High Speed Rail a better path up the Peninsula).

6. Do some specific comparisons: along Seaport Bld. where Ken drove, Fair Oaks Neighborhood, Foster City, Redwood Shores, San Carlos Airport Levee, Oyster Point, Alameda Point, Point Molate (Richmond), Treasure Island, Park Merced, Fruitvale (Oakland), the one near Pleasanton BART, etc. as useful.

7. Role in meeting Bay Area Targets (or better them) in SB 375 implementation and achievements.

Comments

The Saltworks project offers some benefits to the community and the region. Of special interest to the League's committee on Climate Change and Local Issues is the benefit of possible reduction in greenhouse gas emissions by higher density housing near transportation hubs, jobs and services. This document makes it clear that our CCLI committee has identified potential problems that need to be addressed. Regarding saving the bay and restoring marsh tidelands, the EIR should address questions as to what fraction of the bayshore should be preserved or restored in order to permit wildlife to flourish or for people to enjoy its undoubted scenic benefits. We expect that the City and the public will want to consider the benefits of people of being able to afford housing within easy commuting distance of the workplace, as well as the benefits of enhanced and restored bay lands and wildlife habitat.

*League of Women Voters of South San Mateo County,
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