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July 29, 2019

Redwood City Planning Commission

Redwood City Planning Services

1017 Middlefield Road,

Redwood City, California 94063.

Attn: Anna McGill, Senior Planner

amcgill@redwoodcity.org

Re: Notice of Preparation for 557 East Bayshore Road, Redwood City

Dear Ms McGill,

The Sierra Club Loma Prieta Chapter is pleased to submit the following scoping comments for this project.

The project is mixed-use with residential and commercial components. The residential component would consist of 480 rental units, of which 422 are the base density units and 58 are bonus density units. To obtain the bonus units, the applicant will rent five percent of the 422 base density units at rental rates affordable to very low-income households. In order to comply with the City's Affordable Housing Ordinance, the applicant will also rent five percent to low-income households and ten percent to moderate-income households. The total number of affordable units for the project will be 85. The supporting and integral commercial component will consist of a premier athletic club and spa for families, primarily consisting of a two-level 97,101square foot building and related outdoor spaces

General Comments

This proposed development has all the problems Redwood City should be avoiding and attempting to resolve:

- Building in areas vulnerable to sea level rise,
- Building on unconsolidated bay infill that is subject to liquefaction in seismic events,
- Increased traffic congestion
- Pollution into waterways from intermittent sewage, runoff and drainage problems inevitable in this low-lying area that will experience flooding with increasing frequency
- Submerged utilities and structures that will deteriorate as saline and toxic ground waters rise,
- Loss of the potential area adjacent to the bay for expanding future wetlands that are needed to mitigate sea level rise and the

- Unsustainable rising costs of providing police, fire, and other public services with climate changes to Redwood City, by developing in unsustainable areas.

Development in this area should no longer be considered sustainable for the City of Redwood City. The City should consider transfer of development rights or other measures to prevent further unsustainable developments in this area.

Scoping Comments

We offer the following comments on the scope of the proposed EIR:

Transportation

It is our observation that traffic for the proposed Housing towers and Sports Club building may be actually somewhat larger than envisioned, for this area, in the General Plan.

Therefore, the EIR needs to study the impact of the increased traffic in this area and in the neighborhood, especially since the site is served by only one exit route, at Whipple, for cars. The EIR should include a new traffic study cumulatively for the entire Whipple peninsula, including impact on the nearest freeway on and off ramps for I-101.

Blomquist Extension: We note that there has been discussion, for some years, regarding building a traffic bridge across Redwood Creek, connecting to an extension of Blomquist street, and hence to Woodside Road freeway interchange. It should not be assumed that this should ever be constructed, because it is clear that such a connection will have many negative consequences.

Such a connection, while it may appear to improve traffic by providing an alternate route for traffic to enter and exit the Whipple road peninsula, will actually make traffic worse.

The reality is that it will act as an added lane to 101 freeway, by providing a parallel, connected set of feeder roads connecting Dumbarton bridge and Bayfront Expressway traffic directly to the Whipple interchange. This is currently the situation between the 101/San Antonio Road interchange and University Avenue interchange, where the feeder roads provide an alternate parallel route from San Antonio Road to the Dumbarton bridge and draw heavy freeway traffic during rush hours. As a result, all the businesses on the feeder roads experience difficulty entering and exiting their driveways into rush hour stop-and-go traffic on the feeder roads.

This will have a very negative impact for Redwood City. It will have a particularly negative effect for heavy commercial operations that currently use Blomquist, such as the cement plant and recycled concrete and asphalt plant.

The result, in this case, will be that all businesses that are currently using these roads will be mired in stop-and-go regional traffic along this route and will not be able to enter or exit their driveways during the morning traffic hours and evening traffic hours. In such an event, wait times for resident traffic on the Whipple peninsula, will increase rather than decrease.

Climate Action Plan: It also goes against the goals of Redwood City's Climate Action Plan, to reduce the City's carbon footprint, where the goal is to reduce dependence on freeways rather than to attract even more freeway traffic by providing what would become an additional lane.

Active Transportation: Please include an analysis of the bicycle and pedestrian connections to downtown

- Please include analysis of pedestrian/bicycle traffic at freeway underpass along Redwood Creek

- Pedestrian / bike bridge across Redwood Creek. Please include traffic that will use this bridge assuming that improved legal access ramps to the bridge will be part of this project as a required mitigation for traffic.
- Pedestrian and scooter access : Please include analysis of how convenient it will be for pedestrian and scooter traffic to access downtown and how this can be improved as mitigation for traffic.

Safety and Transportation: The peninsula has only one access route for emergency operations like fire and police. However, it has a highly accessible waterfront and many marinas for rescue operations from the water. In the event of an emergency, such as a fire or seismic event, please include and analyse the possibility of rescue operations accessing residents using boats to move people away from danger.

Aesthetics

- Please provide visual depictions and analyze the visual impacts of these dominant structure(s) on trail users on Inner Bair trails
- Please analyze the impacts of Artificial Night Lighting and of Daytime Glare on trail users
- Please analyze the impacts of reflected sunlight and glare on drivers on 101, and on air traffic for San Carlos Airport.

Geology

The project site is on fill, land created by uncontrolled dumping of building materials and toxics and is located in a seismically active site along the bay, thus it may be susceptible to liquefaction or/and uncertain seismic action. We note that the structural system is not included in the project description.

- Please include description of structural system to be used for both commercial and residential structures to describe how the structures will withstand the seismic actions
- Please conduct modeling to determine the slough's near bank shear stress values, and to determine the potential of the Project (especially underground elements) to contribute to movement of the bank along the slough and greater need for bank stabilization treatments of bay trail in this reach.
- Please evaluate the additional risk of liquefaction due to uneven makeup of soils because of historical dumping in the area.

Biological Resources

The Project will form a wall along the bay slough. It may cast a shadow over the slough at certain times of the year and reflect light to produce glare in the afternoon in summer. At night, ambient light will increase. Thus, this project is likely to cause harm to riparian and aquatic life attracted to Smith Slough which is part of Bair Island Wildlife Preserve.

- Please describe the Beneficial Uses of the slough near the Project site and characterize its significance in the Project or how the Project actions would impact the beneficial uses. Please provide adequate mitigation.
- Please analyze the biological impact of shading during the day and increased ambient lighting during the night on the natural elements of Bair Island.
- Please provide analysis for impacts to resident and migratory avian species in the creek corridor.
 - The risk of collision with glass killing many birds
 - Impact of increased ambient lighting in the creek corridor due to indoor and outdoor lighting.

- Please mitigate for use of outdoor LED lighting by using fixtures that produce Correlated Color Temperature (CCT) of no more than 3000. See <https://www.led-professional.com/resources-1/articles/hazard-or-hope-leds-and-wildlife> for additional recommendations.
- Please analyse the risks to proposed major planting from sea level rise, since ground water salinity will be changing and increasing over the next few decades.
- Use of Pesticides and Fertilizers: The use of herbicides, pesticides, rodenticides and fertilizers can cause direct and secondary harm to aquatic and terrestrial wildlife. This risk is heightened at this location so near to riparian habitat and a national wildlife refuge.

Mitigation:

- Do not allow the use of pesticides during construction or afterwards during operation of this project. Include pest management as part of the development agreement for continued vigilance.
- Identify alternatives to biocides and require the use of Integrated Pest Management techniques for this project. Provide for transparent reporting and monitoring of pest management as part of any development and management agreement.
- Housing along Bair Island can bring domestic cats and dogs into a sensitive ecological area. Please include, in required mitigation, strict guidelines for residents and businesses to allow no pets, and that this be a part of all rental agreements.
- Please include mitigation requiring garbage cans and bins that are securely closed to prevent animals such as rats, feral cats, raccoons and other predators of shorebirds and their nests, being attracted to this area which is fronting a national wildlife refuge.

Hydrology and Water Quality

Dewatering and Below Ground Construction

- Please analyze the following potential impacts, given that this is a high ground water area in potentially toxic landfill:
 - Surface water quality. Do samples show any potentially harmful contaminants that need to be removed with a treatment system before being discharged?
 - Ground water quality. Given that the site has historically been used for industrial purposes, do samples show any potentially harmful contaminants that need to be removed with a treatment system before being discharged? Please test and analyze for the presence of toxic compounds in sediment and in groundwater.
 - Impacts of groundwater pumping on the slough (Hydrogeological Study). Will the interaction between groundwater and surface water be impacted?
 - Impacts of groundwater pumping on the capacity of the City's storm drain system or sanitary sewer system, especially during the rainy season from November through March.
 - The impact of the noise generated during groundwater pumping should be included in the Noise analysis.

- The potential for trash from the site accumulating in the bay (including during construction).
- Impacts of the completed below ground structure.
 - How will the exterior and interior swimming pools be designed to be drained or cleaned given high ground water conditions.
- Proposed mitigations
 - Test groundwater discharged into a storm drain for contamination per Regional Water Quality policies. In addition, test discharged water for contamination by toxic compounds.
 - Install a sediment settling tank system and/or treatment system to improve discharged water quality.
 - If feasible, percolate the discharge onto the construction property rather than into the storm drain system.

Energy

- The implementation of the project would result in an increased demand for energy on-site, and we propose that the EIR should propose design measures to reduce energy consumption.
 - The EIR should provide the anticipated electric and gas utility demand during construction and operation of the Project, and provide a seasonal break down to analyze summer (July-August) and winter (December-January) demands of heating and cooling.
 - Will the Project be an all-electric commercial and residential complex as will be recommended San Mateo County and Redwood City's new Reach Codes, requiring all-electric facilities in order to meet the city's carbon reduction goals ?
 - The Project proposes some large glass wall surfaces to volume ratio. Please analyze the optimum of glass surface needed for minimizing energy use while minimizing bird deaths, in this bird-rich area, through collisions with glass while allowing adequate internal daylight penetration.
- Mitigation should require:
 - The Project should be required to reduce the glass surfaces where possible in order to reduce bird collisions for Bird-safe design for the buildings¹

Water Supply

Please provide a Water Supply Assessment and evaluate cumulative impacts for other development projects in the pipeline.

With so many projects in Redwood City either under construction or in development review, the cumulative impacts on water supply may be significant and need to be reassessed and tracked.

Please provide an updated Water Supply Assessment and include cumulative impacts.

- How will additional supplies be provided? How will this project and others that draw from the same water supply source(s) impact that water supply source? Does that source have the capacity to meet all the new demands? Will the additional demand bring overall water demands above or close to the threshold where the source will need to be upgraded to meet the demand?
- Will the project include on-site water reuse (gray and black water) and rainwater capture?

¹

- Will clean storm water guidelines work? Will the bioswales, for example, be capable of providing adequate ground water filtering or should porous pavement also be considered for parking areas?
- Landscaping should use recycled water. Will the recycled water be able to be used for landscaping, keeping in mind that the recycled water is slightly too saline for some plants compared to city water supply?
- Will the pools require additional water supplies?
- Will the pools be salt water or fresh water and what is the anticipated consumption.

Utilities

- Please analyse the adequacy of Low Impact Development (LID) strategies, including on-site storm water management, in order to meet Green Infrastructure requirements given the proximity to the Bay.
- What is the strategy for rain water from rooftops?
- What is the expected life span of the underground utilities in bay mud and salt water and what provision will be made for replacement of these at end-of-life to prevent pollution and leakage into the bay ecology.

Alternatives

The EIR requires that an alternative be studied that has a reduced environmental impact.

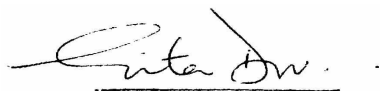
Our preferred alternative is no project in this location and transfer of development rights to a location, nearer the transit corridor, that is outside this area, which is earmarked for flooding with sea level rise, access roads that will be under water, remote access to services and expensive-to-maintain infrastructure for the city.

Please include the following alternatives:

- A reduced scale alternative that provides a lower profile when viewed from Bair Island and staggers development height.
- A reduced energy use alternative that uses less glass in the building envelope or bird safe design to reduce bird strikes
- An alternative that combines a reduced scale and bird-safe design

We thank you for the opportunity to provide scoping comments for this project

Respectfully,



Gita Dev FAIA

Co-Chair, Sustainable Land Use Committee

Sierra Club Loma Prieta Chapter (SCLP)

Cc James Eggers, Executive Director SCLP

Gladwyn D'Souza, Chair, Conservation Committee, SCLP