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**PACIFIC COAST FEDERATION
of FISHERMEN'S ASSOCIATIONS**



Noah Oppenheim
Executive Director
Glen H. Spain
Northwest Regional Director
Vivian Helliwell
Watershed Conservation Director
In Memoriam:
Nathaniel S. Bingham
Harold C. Christensen
W.F. "Zeke" Grader, Jr.

Please Respond to:

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August 11, 2019

TO: Lina Velasco
Director of Planning and Building Services
City of Richmond
PO Box 4046
Richmond, CA 94804-1630
Submitted electronically to lina_velasco@ci.richmond.ca.us

RE: Response to NOP of PEIR for Point Molate Mixed-use Development Project

Dear Ms. Velasco,

Thank you for the opportunity to comment on the City of Richmond's Notice of Preparation of a SEIR for the Point Molate Mixed-use Development Project.

I write on behalf of my organization to express concern that the proposed development at Point Molate has not been appropriately assessed and evaluated for its impacts to the submerged eelgrass habitat located downslope of the project. The assessment of the impacts of your proposed development must include a thorough evaluation of the impacts to eelgrass habitat, which is critical for the growth and abundance of juvenile Dungeness crabs, among other species native to the San Francisco Bay.

The Pacific Coast Federation of Fishermen's Associations (PCFFA) is the largest organization of commercial fishermen on the West Coast, representing the interests of hundreds of family-owned commercial fishing operations who harvest and deliver fresh seafood to American consumers and for export. Collectively, we represent many thousands of family wage jobs and a West Coast commercial fishing industry that contributes billions of dollars to the U.S. economy.

Hundreds of our members depend on the California Dungeness crab fishery for their livelihoods, as well as a functional and productive San Francisco Bay ecosystem. Any project that would reduce the productivity of this important public resource would necessarily need to assess the expected and cumulative impacts as part of the CEQA process. However, the City of Richmond's proposed use of an uncertified and incomplete FEIR for a previous iteration of the Point Molate development project as the basis for a Supplemental EIR appears to be inconsistent with the requirements of CEQA. Although the FEIR purported to assess impacts to the Bay ecosystem and eelgrass habitats, there was no cumulative effects analysis that included losses in economic productivity driven by losses to eelgrass habitat, nor was there an appropriate Statement of Overriding Considerations to justify the identified impacts.

In order to comply with the requirements of CEQA, we strongly encourage you to begin the CEQA process *de novo* for the current iteration of the Point Molate development project. Further, we encourage you to include with such an analysis a complete and accurate assessment of the cumulative impacts of your project to the San Francisco Bay ecosystem including impacts to economic activities like commercial fishing that may be harmed by reduced productivity of eelgrass habitat.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Noah Oppenheim', with a stylized flourish extending to the right.

Noah Oppenheim
Executive Director