



Blue Frontier Campaign
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Lina Velasco
Director of Planning and Building Services
City of Richmond
Planning and Building Services Department
450 Civic Center Plaza
P.O. Box 4046
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Re: Notice of Preparation of a Subsequent Environmental Impact Report (SEIR) for a proposed mixed-use development project (Modified Project) on the former Point Molate Navy Fuel Depot and Winehaven Historic District (Point Molate Site or Project Site)

Dear Ms. Velasco,

Blue Frontier Campaign is a national ocean and coastal conservation and policy group based in Washington D.C. and Richmond California. We have a core contact group of 6,000 ocean activists, policymakers and media professionals we work with and have led coalitions, awards, marches and other events as well as producing ocean-oriented books, articles, videos and additional media. While working primarily at the national and global level we also believe that, in the face of the climate emergency and biodiversity extinction crisis “the local is global.” Therefore we have been actively involved in working to protect and promote a best public use outcome for the city owned lands and waters of Point Molate since 2007, most recently as a member organization of the Point Molate Alliance.

Along with its historic, cultural and other public values, the Point Molate headland is an example of the resiliency of nature left unpaved, including pristine eelgrass beds with great biological and commercial value, hilly coastal grassland and native plant habitat ranges managed by mule deer, osprey and wild turkey with colossal toyons – Christmas berry shrubs – the size of live oaks. There are also live oaks, federally protected Suisun Marsh aster, native Molate blue fescue – a unique (endemic) local bunchgrass horticulturists have bred for landscaping – coyote brush, wild mint, Dutchman’s pipe vine, and its rarely seen but well-documented companion, the pipevine swallowtail butterfly. In two recent 2019 ‘Bio-blitzes’ - citizen science surveys conducted by 77 trained observers - 404 species of birds, plants, insects and animals have been photo-identified on the city-owned Point Molate property. This suggests its unique interlinked habitats (marine, coastal, wetland, grassland and upland), constitutes a biological hotspot of special significance on San Francisco Bay.

We believe the original city certified 2011 FEIR (actually finalized in mid-2009) is dangerously out of date and far too specific to a Casino development plan that was rejected by the people of Richmond and had a far smaller residential and property footprint than the proposed mixed-use development which, among other things, could triple the number of housing units and associated infrastructure (or lack thereof). Also, since the project was never approved due to popular opposition, the city certification of the FEIR may not make it legally applicable to the new, also widely unpopular, plan.

It’s our belief that the city’s attempt to ‘amend’ this FEIR as an SEIR has little credibility from a biological (or legal) point of view and will not meet the minimum requirements to come into compliance with the high standards set by CEQA. Taking this approach will only create new liabilities and risks for the city of Richmond. Therefore we call on the city to initiate a new, updated and adequate EIR for the proposed mixed-use plan.

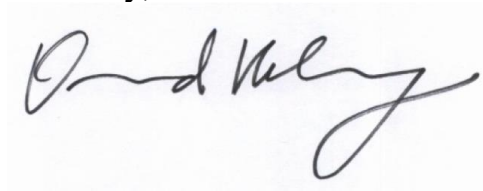
If a couple decided to get a dog and studied up on pet care but then had a baby instead, they would not ‘amend’ their pet-care plan and call it their child-care plan. The Casino Project was a dog, whose FEIR has little or no relevance to today’s proposed Mixed Use Plan, which we believe has its own insurmountable challenges in terms of the environment, economic impact and equity issues.

At the 2018 Global Climate Action Summit in San Francisco famed Primatologist Dr. Jane Goodall pointed out that protecting nature was the “forgotten solution,” to the climate crisis. Still, as early as the 1969 National Environmental Policy Act (NEPA) the United States has recognized the need for EIR documentation of actions “significantly affecting the quality of the human environment.” And a year later California passed the California Environmental Quality Act (CEQA) of 1970 to make sure high standards of protection were applied in a rigorous manner in our state.

Given the global coastal protection movement also began here in San Francisco Bay and that today Point Molate is the only unprotected publically-owned open green space facing on San Francisco Bay, we call on the city to initiate a new Environmental Impact Report to address the new proposed mixed use plan for Point Molate. This would include the 404 species identified to date by the recent surveys, impacts related to climate adaptation and mitigation including wildfire risk, water quality issues impacting the Bay and Eelgrass beds and other factors not accounted for in the earlier, inadequate 2011 report.

We would also like to see an EIR for the Community Plan that has been offered as an alternative mixed- use plan for Point Molate.

Sincerely,

A handwritten signature in black ink, appearing to read "David Helvarg", written in a cursive style.

David Helvarg
Executive Director