

07/31/2019

Dear Ms. Velasco,

I would like to provide comment regarding the City's Notice of Preparation for a Subsequent Environmental Impact Report for the Point Molate mixed-use development project. The City is attempting to embark on a project that rejects all the current literature on responsible environmental urban planning. Therefore, the City has a very heavy burden of proof to justify the environmental outcomes of this project.

My comments will cover the following topics: 1) the overall out-datedness and non-applicability of the 2011 FEIR, 2) urban planning and climate change, 3) the open-space requirements for this project 4) the loss of outdoor space to current and future multi-family housing dwellers, and 5) frog habitats.

1. 2011 FEIR OBSOLECENCE

On this topic, I mainly wish to reiterate in writing the points I made verbally on July 29th. The original EIR is clearly out of date. I pointed out a few non-refutable and simple examples: using year 2007 construction standards, each residential buyer receiving a complementary electric lawnmower, and the Tribe replacing the City's entire vehicle fleet with hybrids. The City has not offered any statements regarding what in the original EIR it feels is out of date, what is worth salvaging. The point is, aside from the fact that we do not even have an approved project, we have no fixed reference points to even begin a discussion of a Subsequent EIR. Therefore, the first step, even prior to a preliminary scoping session, is for the City to reproduce the EIR. As I said, this is likely to be tantamount to starting from scratch.

The first three words of almost every sentence in the mitigation chapter are "The Tribe shall...". Although the original EIR ostensibly was intended to cover alternatives A-E, it is clear that the mitigation chapter pre-supposed only the casino alternative, and is barely relevant to alternative D.

Still, the project that the City is currently proposing is not comparable to Alternative D. Even the City, in its own documents, have stated that the consideration of any project with more than 1,100 residential units would require and a brand new EIR. On this point alone, a new EIR is required.

2. CLIMAGE CHANGE

The project which the City is considering defies all the accepted wisdom on how cities should be responding to our planet's current climate emergency.

The urban designer and director of the Sustasis Foundation, Michael Mehaffy PhD., discusses the correlation between city sprawl and green-house gas emissions in the attached article.

<https://www.cnu.org/publicsquare/2019/03/19/urban-dimensions-climate-change>

His conclusion is corroborated by a study conducted by Salt Lake City.

<https://arstechnica.com/science/2018/03/in-salt-lake-city-suburban-sprawl-is-bad-news-for-climate-change/>

But it is not only an issue of the emissions of GHG due to the inefficient location of housing. It is also well documented that preserving greenspace is a city's most vital weapon in fighting climate change. The David Suzuki Foundation released a study, *Carbon in the Bank*, which found that the forests and wetlands in the Ontario Greenbelt sequestered an amount of CO2 equivalent to the greenhouse emissions released from Ontario's entire transportation, industrial, building, and electricity sectors combined.

Mayor Butt recently returned this month from the U.S. Conference of Mayors, and he participated on that conference's climate change committee. This committee passed a resolution which mainly side-stepped supporting actions which cities can take on their own volition, and instead put the onus of combatting climate change almost entirely on the federal government and private industry. Nevertheless the mayors, at least, recognized that this is a national (but not international) emergency.

Climate change, if unchecked, will have mounting impacts on human health, natural systems, and infrastructure, creating new costs for individuals, businesses, and governments

WHEREAS, the U.S. Conference of Mayors has long supported concerted action to reduce GHG emissions through its support of the Mayors Climate Agreement, the Paris Climate Agreement, the Green Power Plan, the Energy Efficiency Conservation Block Grant and other means of reducing GHG emissions

WHEREAS, this mayoral commitment to combating climate change has translated into action in cities throughout the county, as mayors have adopted aggressive climate targets and climate action plans in recognition that urban residents are most at risk from asthma and other health effects of particulates and other air pollution

NOW THEREFORE BE IT RESOLVED, the U.S. Conference of Mayors declares climate change a national emergency.

3. OPEN SPACE REQUIREMENTS

The international scientific community has already declared a climate emergency. They are now on the verge of declaring a biodiversity emergency as well. From the UK Independent (05/06/2019):

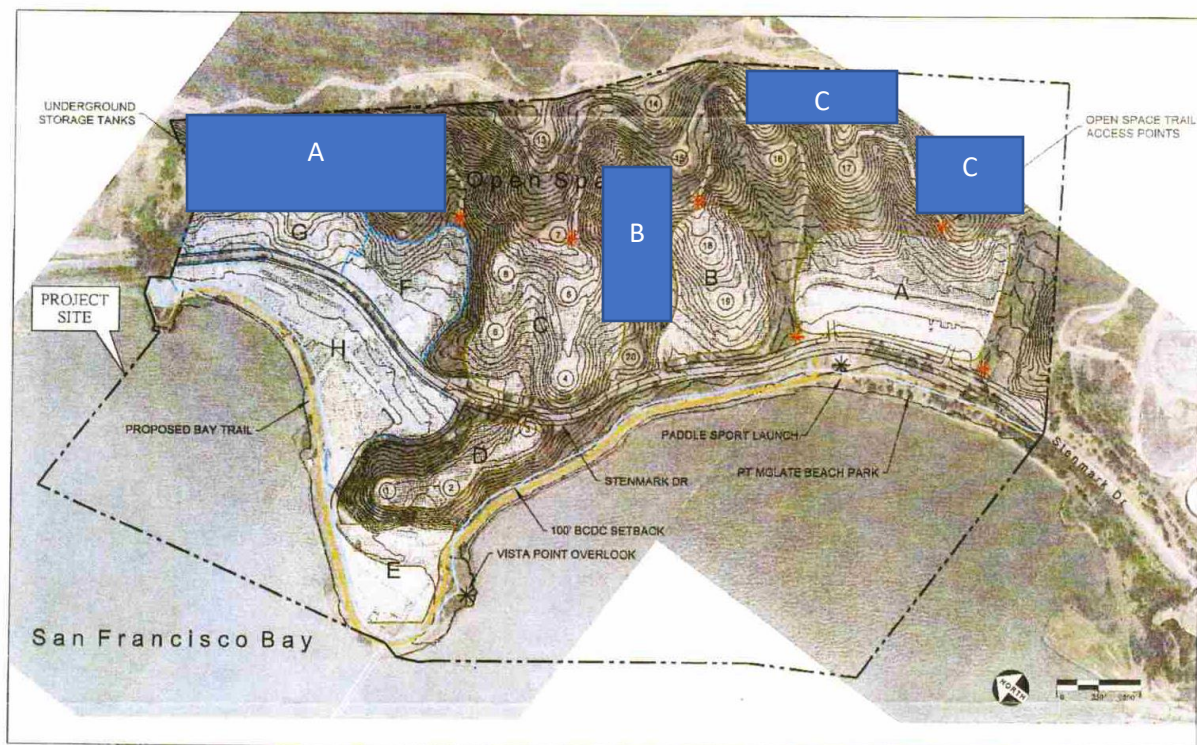
Scientists and environmental lobbyists alike are calling on world leaders to treat the annihilation of wildlife and [plants](#) as a global emergency as [UN](#) experts [sound the alarm in a landmark new report](#).

The document, published on Monday, paints a devastating picture of [biodiversity](#) loss, with up to a million species facing extinction in the world's sixth mass die-off.

Planned as a wake-up call for policymakers, the UN's global assessment on the state of [nature](#) will warn that without urgent action, future generations of people are at risk from the collapse of life-support systems providing food, pollination and clean water.

The Federal Court “judgement” requires that 70% of Point Molate is to remain open space. Open space is important for the protection of habitat and for human enjoyment from observing habitat. From the map provided with the NOP, the addition of development area C, along with the enlargement of development areas A and B reduce the Open Space to less than 50%. Not only is this an environmentally destructive revision, it also leaves the City vulnerable to further lawsuits and Court action due to its noncompliance with the court judgement.

Open space is beneficial, whether it is accessible to people or not. Nevertheless, it is important for the EIR to clearly delineate the number of acres of open space that will be available for hiking and other forms of recreation because most residents are under the false impression that 70% open space means 70% recreational area.



Areas A, B, and C will not be accessible to people. The EIR should make clear that only 30 to 40 acres of land will be available for human recreation.

Area A: One of the few bold environmental measures in the 2011 FEIR is the requirement for a 2:1 mitigation ratio for lost habitat, **on site**. The EIR designates the eucalyptus stands (area A) as the main area where mitigation habitat will be relocated. It is curious as to why so little has been said about the eucalyptus stand removal in the original EIR as well as in subsequent forums, WRT cost analyses, and City Counsel meetings. Still, it is a positive and environmentally beneficial action. However, the original EIR stated that is area *will be fenced off*. It is important for the EIR to make clear that this area will not be available for public enjoyment.

Area B: Area B is a steep ravine, with a contaminated landfill at the bottom. The landfill is a remediation site which will require monitoring for perpetuity. Area B will not be available for recreation.

Area C: Area is too steep for people to access.

4. THE DRAMATIC SHIFT TO MULTI-FAMILY RESIDENTIAL

Richmond is in the process of adding thousands of units of multi-family residential, and regionally, hundreds of thousand units of multi-family housing are under construction or in planning.



These homes will not have yards, other than small quadrangles. The EIR must address the issue of these residents having little open space at their home, and also the limited availability of parks and open space off-site.

The San Francisco Bay Area Planning and Urban Research Association state:

As environmentalists, we know that we need infill development and densification in cities if we are to direct our growth into balanced, livable cities with a greenbelt of farmland and wilderness surrounding us. Our greenbelt must be saved from sprawl. Therefore, cities must plan for an increasing population. We need higher densities in parts of San Francisco. We also desperately need parks and open spaces throughout the city that offer people rest, leisure, and a chance to be connected to nature. I believe it is possible to achieve both goals.

Internationally recognized planner and architect, Keith Griffiths, writes:

High-density clusters may be best positioned over existing transportation nodes to reduce journey frequency and time. High-density urban nodes require open space, parks and waterways in order to offset the concentration of humanity.

Political ecologist, Heather Alberro, writes in a political :

The current climate and ecological crisis demands a radical redesign of how we live and organise our societies. Yet these urgent changes, though complex, are far from impossible.

Urban greenery wouldn't just help lessen the impacts of climate change and improve air quality. Evidence from a range of disciplines has uncovered numerous social, psychological, and health benefits of human exposure to green spaces. These include stress and anxiety

reduction, improved cognitive functioning, lowered risks of depression, and overall greater mental and physical wellbeing.

5. FROGS



There will be many botanists and wildlife experts who will send you comments on the biological resources at Point Molate. I make no effort to cover this topic comprehensively. However, I would like to mention frogs because there was no mention of amphibians in the 2011 FEIR. The drainages area along either side of Stenmark Drive are teeming with tadpoles during the rainy season. A new EIR must cover what the potential construction of sidewalks along Stenmark Drive would have on this wonderful habitat.

Thank you for your consideration of my comments.

Paul Carman

