



August 2, 2019

Lina Velasco  
Director of Planning and Building Services  
450 Civic Center Plaza  
Box 4046  
Richmond, CA. 94804

Subject: Point Molate SEIR Notice of Preparation

Dear Ms. Velasco,

The following comments are from Turtle Island Restoration Network (TIRN), headquartered in the Bay Area with more than 200,000 supporters nationwide. Our mission is to protect and restore marine species and their habitats throughout the world.

TIRN believes that the creation of a new Environmental Impact Report (EIR) is necessary. TIRN opposes the creation of a Subsequent Environmental Impact Report (SEIR) based on an outdated and substantially different FEIR for the following reasons:

- The original EIR was finalized in July 2009 but it was not approved as the project was terminated. The casino project in the original EIR is significantly different from the newly proposed mixed-use development project. The development footprint has increased and changed. The uses have changed.
- The greater development density will eliminate existing habitat and the potential for restoring habitat for sensitive, rare, threatened, and endangered species. The species assessments for Point Molate conducted by Tetra Tech and Analytical Environmental Services are over 10 years old and are not sufficient to evaluate critical habitat and species presence/absence as it exists today. New biological assessments must be conducted for a new EIR. These assessments must lead to an analysis of the effects of 2,200 residences and commercial venues on the biodiversity and environmental health of Point Molate, the City of Richmond and the greater San Francisco Bay Area. Is there existing critical habitat or the potential for critical habitat for native species as well as fully protected species such as the Salt Marsh Harvest Mouse? The potential elimination of habitat for sensitive, rare, threatened and endangered species must be quantified.
- With the recent and current climate-change related events, it is imperative that cities, states, and the nations of the world cumulatively increase carbon sequestration to offset greenhouse gas emissions. How will this project decrease or increase carbon sequestration ?

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- Rare Coastal Prairie grassland species exist on Point Molate and must be protected. How will this project protect existing Coastal Prairie grasslands and affect the potential for growth of Coastal Prairie grasslands?
- The eelgrass beds along the shore of Point Molate must be protected and preserved. How will the project affect these beds? How will the project prevent the input of stormwater runoff, sediment and other pollutants into the bay? What will be the effects of the increased impermeable surfaces created by the project? These particular beds are essential as plant stock for eelgrass restoration throughout SF Bay. Eelgrass is the base of the marine food web, providing critical habitat for native sensitive and listed species including Pacific herring, Dungeness crab, Chinook salmon, steelhead trout and migratory waterfowl. Harming critical habitat for listed species is a violation of the Federal Endangered Species Act.
- CEQA requires that if in any way, big or small, the proposed project contributes to cumulative impacts created from the past and present, the proposed project shall be considered a significant impact and a cumulative impact analysis is required in the EIR process. This must be done under the new EIR process.
- As indicated in the “Hatch” economic and feasibility study (please see the “Hatch” study submitted by “Citizens for East Shore Parks”), taxpayers in the City of Richmond will be responsible into perpetuity for the costs related to a residential community on Point Molate. This will include the costs of a wastewater treatment plant or the costly offsite transporting of wastewater, new infrastructure for potable water, offsite transport of solid waste, energy infrastructure, road maintenance, and emergency response facilities, employees and services. How will the project offset potential increased taxes for City of Richmond taxpayers as a result of the development?
- Richmond is an underserved and disadvantaged community. A disadvantaged community is one where the people suffer from a combination of economic, health and environmental burdens. How will selling and developing this public land for wealthy private buyers uphold the guidelines of City of Richmond’s General Plan 2030; Chapter 3 - Land Use and Urban Design; Goal LU4 - Enhanced Environmental Quality; Action LU4.E “Identify and incorporate opportunities for public open space and recreational facilities”?
- How will the project integrate previous planning efforts including the “Point Molate Reuse Plan and San Pablo Peninsula Open Space Study” and Chapter 7, “Conservation and Natural Resources”?
- The project proposes to develop more than 2,200 single family residences adjacent to the Chevron refinery. The footprint of these residences is in the sea-level-rise buffer between the refinery and the Bay. Residing next to an oil refinery is confirmed to be dangerous due to potential explosions and air and water quality pollution. How will this project protect potential residents from sea-level-rise and potential safety hazards ? Are there adequate escape routes? Will there be on-site emergency response infrastructure and services ?

TIRN joins the following organizations that support the development of a new EIR and question the proposed mixed-use development:

Point Molate Alliance, Citizens for East Shore Parks, Golden Gate, Audubon Society, Sierra Club, Save the Bay, Oakland Waterfront Coalition, Berkeley Partners for Parks, California Native Plant Society, Citizens Committee to Complete the Refuge, Friends of Aquatic Park, Oceanic Society, East Bay Regional Parks Association, Urban Creeks Council, CA State Parks Foundation, Citizens for the Albany Shoreline.

TIRN requests a response to the stated concerns in this letter and how they will be addressed in the new EIR. Additionally, please answer the following question:

Who will benefit from the proposed mixed-use development on Point Molate? Please list the benefits and the recipients of those benefits with references substantiating your response.

Thank you for the opportunity to submit comments both verbal and written in this public process.

Sincerely,

Gail Seymour  
Advisor  
Turtle Island Restoration Network

