

April 13, 2020

Dear Ms. Velasco,

I would like to comment on the DSEIR for the “Modified Project” at Point Molate.

## OVERVIEW

The fact that, in the face of this horrible pandemic, the City has offered an extension only to April 30 for comments on the DSEIR highlights the fact that the City views this Environmental Impact Report as something that should be sidestepped to every extent possible, rather than as an opportunity to learn the true impacts this project will have on our community and environment. The deadline still falls within the shelter-in-place order. Even under normal circumstances, the timeframe to respond to a document of this volume, technical density, and range of topics was not reasonable. Over time we will learn of the number of individuals, agency employees, scientists, organizations, and non-profits who did not have the opportunity to share their wisdom and insights due to both this timeframe and the Covid-19 emergency. And Richmond will pay a steep price for this.

Nevertheless, I know that many others—mostly professionals who are usually paid to do this work—are going above and beyond by volunteering their time to comment on the various topics in this document under the most trying circumstances. Although, my impulse is to write on all these topics: traffic, sewers, land use—because the DSEIR addresses all these issues inadequately, I will confine my comments to one of the topics I addressed in my written comments for the Notice of Preparation: Climate Action. The DSEIR’s approach to climate change is wholly unacceptable.

## THE CLIMATE EMERGENCY

A host of national assemblies, unions of scientists, major cities, and even the Pope have declared a climate emergency. Mayor Butt attended the U.S. Conference of Mayors in 2019, and he participated on that conference’s climate change committee. This committee passed a resolution stating, in part:

***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.***

CLIMATE ACTION CHOICES

The question becomes whose standards should be followed for climate action vis-à-vis development at Point Molate? Do we follow the Union of Concerned Scientists? Do we follow the United Nation’s IPCC? Do we follow the EPA? Do we follow California State SB 100?

The DSEIR lists the California legislative goals for GHG emission reductions but at no point applies them. Instead, the DSEIR first looks to the BAAQMD for guidance for thresholds of significance (1,100 MT of CO<sub>2</sub>/year) but then concludes that this is outdated and decides the City should set its own standards.

***the BAAQMD has not updated its quantitative GHG emission thresholds since 2010, and therefore, the City has chosen not to rely on them. There is no other applicable regulatory guidance for setting quantitative GHG emission thresholds. In the absence of such guidance, the City has chosen to set the threshold at zero MT of CO<sub>2</sub>e/year for this Draft SEIR***

It is very noble for the City to set a threshold of zero as the outset, but the DSEIR soon abandons that goal, but still leaves the City still in charge of setting its own standards.

**TABLE 4.2-10**  
MITIGATED (UNMITIGATED) OPERATIONAL GHG EMISSIONS

Category	Residential-Heavy Scenario	Commercial-Heavy Scenario
	CO <sub>2</sub> e (MT/year)	
Area	151 (151)	151 (151)
Energy – Electricity	867 (884)	1,373 (1,381)
Energy – Natural Gas	1,517 (1,517)	1,873 (1,873)
Mobile	6,951 (8,256)	6,380 (8,080)
Stationary	102 (102)	102 (102)
Waste	301 (603)	353 (705)
Water	243 (299)	339 (417)
Ferry	477 (477)	477 (477)
WWTP	257 (257)	257 (257)
Annualized Construction	801	742
<b>Total (MT CO<sub>2</sub>e/year)</b>	<b>11,667 (13,346)</b>	<b>12,046 (14,184)</b>
Source: Appendix M.		

***As shown in Table 4.2-10, under both scenarios the Modified Project would result in unmitigated GHG emissions in excess of the zero GHG threshold described above. Therefore, operational GHG emissions would be potentially significant.***

The DSEIR goes on to lament that, although it would be best to find carbon credits to purchase, they simply cannot be had.

***Requiring the Modified Project proponent to purchase offsets from entirely within the SFBAAB is considered infeasible due to the unavailability of such offsets as the current estimated offset demand is far greater than the available supply of offsets within the SFBAAB. Offsets that originate outside of the SFBAAB are therefore necessary to meet the demand and reduce GHG emissions. Further, given the length of the construction period, the Modified Project would be required to purchase offsets throughout the life of the project, over a period of approximately next 30 years. There is a limited supply of “verifiable, reliable, real” carbon offsets currently.***

So then, now that the DSEIR leaves Richmond to police itself, what are the City's goals to address the climate crisis? The DSEIR lists these applicable goals from Richmond's General Plan Energy and Climate Change Element:

***GOAL EC-4 Sustainable Development. Reduce energy consumption by promoting sustainable land uses and development patterns.***

***Policy EC-2.4-Safe Walking and Bicycling.***

***Policy EC-2.6 Private Automobile Use. Work toward creation of an urban landscape that will reduce reliance on private automobiles through land use planning***

***Policy EC-3.1 Renewable Energy. Promote the generation, transmission, and use of a range of renewable energy sources such as solar, wind power, and waste energy***

***Policy EC-3.2 Energy Efficiency and Conservation. Promote efficient use of energy and conservation of available resources in the design, construction, maintenance, and operation of public and private facilities, infrastructure, and equipment.***

***Policy EC-4.1 Mixed Use and Infill Development.***

Appendix N provides a “Consistency Table” where the City grades itself in its ability to meet the goals that it set for itself.

## THE SUNCAL PLAN AND CLIMATE IMPACTS

Whether measured by international, state, or the City's own standards, the DSEIR reflects that that this Modified Plan is a very poor choice during a climate emergency. It concedes from the start that the finished project will generate 10 times the significant threshold level per year of GHG even after taking in to account the compliance with Title 24 building codes, generous access to EV chargers, promotion of shuttle bus use, and other conservation measures.

By the City's own definition of sustainable development, placing 1200+ residential units on a remote headland with only one access point is the exact opposite of climate sustainable land use. Given the stated plans for the Winehaven District, residents daily needs cannot be met from inside the area, and they will be forced to drive the two miles to the I-580 freeway, and then onto a further commercial district in order to fulfill their needs..

The DSEIR focuses mainly on GHG emissions during the construction process, rather emissions generated by the finished development. In reference to the construction period, there is an astounding comparison to be made. At the AstraZeneca cite, the putative reason for not doing a complete removal of highly toxic soils along the S.F Bay was the GHG emissions from the 65,000 truckloads required to haul away 500,000 cu./yds of hazardous soil. In comparison, the grading activities needed for Sunocal's plan will require 300,000 cu./yds of clean soil to be hauled away, and probably a further distance than Kettleman City. This fact is treated as a mere footnote in the DSEIR, although it reflects appalling environmental hypocrisy on the part of the City.

Moving the topic of renewable energy, the violations are just as bad. The City has been moving to update its building code to not allow natural gas hookups for new residential construction. Furthermore, in every intelligent conversation about the future of Point Molate, including the WRT infrastructure analysis, there has been a shared common assumption that natural gas lines would not be extended into Point Molate. The DSEIR reflects that SunCal intends to have natural gas hookups for the residential units. The DSEIR projects that the finished development will burn 358,000 British thermal units of natural gas per hour. The City is free to tout the Title 24 solar requirements-its State Law-but this project cannot claim to have any true commitment to renewable energy. What makes this even more troubling is that this reflects that the SunCal development will be unfettered from City codes and ordinances, and it will be free to make its own rules for the Point Molate area.

The DSEIR's main boast of energy efficiency in the consistency tables in the reuse of materials in the restoration of the Winehaven District. First, this fact would be true for any future plan for Point Molate. Second, the rehabilitation represents a small fraction of the raw materials required for SunCal's enormous build-out in comparison to the Community Plan.

Most of the performance goals listed in the consistency table reference the normal day-to-day behaviors which responsible people follow, no matter where they live: recycle, conserve water, ride a bicycle, buy a fuel-efficient vehicle. Few, if any, items on the consistency table have a unique connection to the SunCal plan.

#### PROPER EVALUATION OF THE SUNCAL PLAN CLIMATE IMPACTS

The purpose of an Environmental Impact Report is to compare the differences between alternative land use choices. Therefore to understand the true impacts of the "Modified Project", there must be a direct comparison of the Modified Plans GHG emissions to the GHG emissions from a competing plan-for example, the Community Plan, where only the Winehaven area and immediate environs are developed, and the remainder of the 413 acres are maintained as a carbon sink.

By all proper definitions of the term sprawl, the SunCal plan meets these definitions. 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>

In contrast, the DSEIR must perform a calculation which demonstrates GHG emissions for a mostly commercial use inside the Winehaven area, and the remainder of the dry property maintained as natural grassland. This calculation is important because of this study by the John Muir School of the Environment at UC Davis has concluded that California native grasslands are more effective carbon sinks than even forests in 21<sup>st</sup> century California.

<https://phys.org/news/2018-07-grasslands-reliable-carbon-trees.html>

#### CONCLUSION

Given the global climate crisis, from a purely ethical standpoint, only a plan that minimizes GHG emissions to every extent possible, but at the same time maximizes equity, economic opportunity, and environmental justice should be considered. A final SEIR, reevaluating these criteria fairly and accurately, will only conclude that the Modified Plan is inappropriate for the current vulnerable state of our planet.

Most Sincerely,  
Paul Carman  
Former PMCAC Chair

