# California Regional Water Quality Control Board
## San Francisco Bay Region

1515 Clay Street, Suite 1400, Oakland, California 94612
Phone (510) 622-2300 • FAX (510) 622-2460
http://www.waterboards.ca.gov/sanfranciscobay/

**Linda S. Adams**
*Secretary for Environmental Protection*

**Arnold Schwarzenegger**
*Governor*


June 24, 2010
CIWQS Place No. 753392

Sent via electronic mail: No hard copy to follow

City of Redwood City
1017 Middlefield Road
Redwood City, CA 94063
Attn.: Thomas Passanisi, Principal Planner
Email: tpassanisi@redwoodcity.org

**Subject: Comments on Draft Environmental Impact Report for the NGP for Redwood City, SCH No. 2010052034**

Dear Mr. Passanisi:

San Francisco Bay Regional Water Quality Control Board (Water Board) staff has reviewed the Draft Environmental Impact Report (DEIR) for the NGP for Redwood City (NGP). The DEIR assesses the potential environmental effects of the adoption and implementation of the proposed NGP for Redwood City. The NGP is a comprehensive update and revision of the 1990 Redwood City General Plan.

The Program EIR serves as the basis for environmental review and impact mitigation for adoption and implementation of the NGP. Redwood City will review subsequent projects for consistency with the Program EIR and prepare appropriate environmental documentation pursuant to CEQA provisions for Program EIRs and subsequent projects. Based on the information provided in the DEIR, we offer the following comments.

**Comment on Cargill Property**

The NGP will retain the exact same land use designations for the salt crystallization pond area, known as the Cargill Property, from the 1990 General Plan. Those designations are: "Open Space/Future Development Expanding Limits of Urbanization" and "Open Space/Unimproved Area Devoted to Preservation of Natural Resources, the Managed Production of Resources, Outdoor Recreation, or Public Heath and Safety." The retention of the "Urban Reserve" designation on the western portion would continue the City's designation of that portion of the site for unspecified future conversion to urban use. The retention of the "Open Space -

Preservation" designation on the eastern portion would allow for the continuation of the same allowable uses as under the site's current general plan designation.

The Water Board supports the continuation of these land use designations for the salt crystallization pond area, since it protects an important biological resource. As discussed in 4.4 Biological Resources (pages 4.4-15 – 16), salt crystallization ponds support a distinctive and highly specialized salt-tolerant biota. They also provide foraging and nesting habitat for a variety of birds. When no longer used for salt production they can be restored and support beneficial uses and habitat diversity of the bay ecosystem.

We acknowledge that the DEIR discusses Redwood City's receipt of an application for development of the Cargill Property and understand that they have initiated a separate environmental review and public participation process regarding the development of the site.

**Comments of National Pollutant Discharge Elimination System**

The text on page 4.8-11 of the DEIR in the first paragraph under the National Pollutant Discharge Elimination System needs to be revised to indicate that "construction sites that disturb ~~five~~ one or more acres of land." Also, the last sentence's statement in this paragraph that "the project sponsor is required to comply with two NPDES permit requirements" is unclear. The text needs to be revised to specifically identify what permit requirements they are referring to.

**Comment on Regional Water Quality Control Board – 401 Certification**

To be consistent with Executive Order W-59-93 (i.e., California Wetlands Conservation Policy), the text on page 4.8-12 of the DEIR should be revised as follows: "The RWQCB has a policy of no-net-loss of wetlands and ~~typically~~ requires mitigation for all impact to wetlands before it will issue water quality certification."

**Comment on San Mateo Countywide Water Pollution Prevention Program**

This section on page 4.8-13 of the DEIR needs to be updated to refer to the Municipal Regional Stormwater NPDES Permit (MRP), which was adopted by the Water Board on October 14, 2009 (Board Order No. R2-2009-0074). The reference to the MRP revised Tentative Order should be deleted. The reference to "a host of NPDES Permits to discharge stormwater runoff from . . ." and the associated footnote 15, should be deleted as well, since these orders have all been rescinded by the Water Board.

**Comment on Impact 4.8-2 through Impact 4.8-5 (pages 4.8-20 through 4.8-24)**

The following needs to be added to all of these sections:

"However, Provision C.3. of the MRP contains source control, site design and stormwater treatment requirements for all new development and redevelopment projects. Provision C.3. of

the MRP requires that new development and redevelopment projects reflecting certain land uses (i.e., parking lots, restaurants, gas stations and auto repair), which create and/or replace 5,000 square feet or more of impervious surface, must provide hydraulically sized treatment for the stormwater runoff. All other new development and redevelopment projects that create and/or replace 10,000 square feet or more of impervious surface must provide hydraulically sized treatment for the stormwater runoff. The required stormwater treatment systems must be LID treatment measures, defined as harvesting and re-use, infiltration, evapotranspiration, or biotreatment.

Additionally, the MRP identifies certain geographical areas within San Mateo County where new development and redevelopment projects must provide hydromodification controls so as not to cause an increase in the erosion potential of the receiving stream over the pre-project (existing condition)."

**Comment on Appendix A: Goals, Policies, and Programs of the NGP**

We appreciate the inclusion of Goal BE-24, "Be a regional leader with regard to sustainable development practices." Appendix A of the DEIR page A-14. This goal is consistent with the State Water Resources Control Board adopted Resolution No. 2008-0030, adopted May 6, 2008, directing the Regional Water Boards to require sustainable water resources management, such as Low Impact Design (LID) measures and climate change considerations.

## Closing

Please contact me at 510-622-2330 or emorrison@waterboards.ca.gov with any questions or comments.

Sincerely,

*Original signed by*

Elizabeth Morrison
Senior Environmental Scientist

cc: State Clearinghouse, state.clearinghouse@opr.ca.gov
SWRCB, DWQ, Stateboard401@waterboards.ca.gov