



## CITIZENS COMMITTEE TO COMPLETE THE REFUGE

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November 20, 2007

Re: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR)  
Patterson Ranch

Dear Mr. Ruhland,

This responds to your NOP for the proposed Patterson Ranch development located in the Northern Plains area of Fremont, CA. The Patterson Ranch site comprise approximately 428 acres between the Alameda Creek Flood Control Channel to the north, the Union Pacific Railroad to the east, Paseo Padre Parkway to the south and southwest, a parcel owned by Cargill Corporation to the southwest, and Coyote Hills Regional Park (Coyote Hills) along the western edge. The parcel is bisected by Ardenwood Blvd. effectively dividing the site into two large parcels consisting of approximately 100.5 acres to the east of Ardenwood Blvd. and approximately 327 acres to the west of Ardenwood Blvd.

The Citizens Committee to Complete the Refuge has an ongoing history of interest in wetlands protection, wetlands restoration and wetlands acquisition. The Committee was originally formed in 1965. Our senior members were part of a group of citizens who became alarmed at the degradation of the Bay and its wetlands. We joined together, and with the support of Congressman Don Edwards, requested that Congress establish a wildlife refuge. The process took seven long years and in 1972 legislation was passed to form the San Francisco Bay National Wildlife Refuge. We turned to Mr. Edwards again, and in 1988 (the first year he submitted it) his legislation to double the size of the Refuge was signed into law.

Our efforts have led to Refuge additions of 1,600 acres of Bair Island in Redwood City, 288 acres of the Warm Springs Unit of the Refuge in Fremont, 128 acres of Mayhews Landing in Newark, the Munster property in Union City, the Cullinan Ranch in Napa, and the Marin Islands, to name just a few.

We have taken an active interest in Clean Water Act (CWA) and California Environmental Quality Act (CEQA) regulations, policies, implementation and enforcement. We have established a record of providing information regarding possible CWA violations to both the Corps and EPA, regularly responding to Corps public notices and informing the public of

important local CWA issues. We also respond to CEQA Negative Declarations and Environmental Impact Reports (EIRs). All of these actions demonstrate our ongoing commitment to wetland issues, towards protecting the public interest in wetlands, in Section 404 and 401 of the CWA, and CEQA.

**Project Description:** The City of Fremont has stated the project will consist of 800 housing units in 10 residential clusters ranging from densities of 6.9 units/acre to 22.7 units/acre east of Ardenwood Blvd, as well as approximately five neighborhood parks, and a two acre commercial area at the corner of Ardenwood Blvd. and Paseo Padre Parkway. To the west of Ardenwood Blvd., the proposal consists of two church sites with parking lots, a 10-acre elementary school site including a parking lot, a 25-acre junior high school site (conceptual design includes a parking lot), and a 38-acre active sports park including active playing fields, tennis courts, basketball courts, community buildings, picnic areas, and parking lots, and areas of open space.

**Jurisdictional Wetlands:** It is unclear from the project description whether any impacts to wetlands will occur.

- Will there be any direct permanent or temporary impacts to wetlands or waters of the U.S., including conversion of one type of habitat to another?
- Will there be any indirect impacts to wetlands, e.g., dewatering of areas due to topographic modification of the lands, impacts to water quality, etc.?

**Aesthetics:** The General Plan (p. 2-4-5 and p. 9-45-48) states:

In trying to describe what is special about Fremont as a place to live, the words “open feeling” often arise. That open feeling is hard to define, but generally it refers to several of the physical characteristics of Fremont that together create a sense of openness. Those characteristics include the open space within the city; the accessibility of open space in the hills and baylands; the views to the hill face, the Bay, and Mission Peak...

F-7 An Open Space Frame that Includes the Hillface, Bay, Wetlands, and Gateways:

It is Fremont’s open space frame – including its hill face, wetlands and Bay – *that set it apart and make it a special place to live*. These open areas are also gateways to Fremont. [emphasis added]

Fremont’s visual resources are important natural resources critical to Fremont’s identity as a community. Fremont’s views of the Bay and the hills make it an attractive location for businesses and homes. Views of natural landmarks help to orient people in the community and provide a sense of historical continuity. *Such resources require*

*recognition and conservation just as do other natural resources that increase Fremont's quality of life and character...[emphasis added]*

...First there are the views entering the City from the Dumbarton Bridge (or from trails in the Wildlife Refuge) where the undeveloped character of the Bay's edge allows for expansive vistas of Fremont, Coyote Hills and the more distant Hill Face rising from the Bay Plain...

*Coyote Hills, an island of hills in a low lying plain with water on two sides, is one of the outstanding natural physical characteristics of Fremont...[emphasis added]*

Comments:

The entrance into Fremont via the Dumbarton Bridge is identified as a natural gateway, and further states "...For travelers, the gateways increase the sense of Fremont as a distinct community." General Plan also identifies Paseo Padre Parkway as one of Fremont's Scenic Routes or "the network of places from which the City is best seen." We are in complete agreement that the open space of the Patterson Ranch land and Coyote Hills Regional Park, make for an experience that in the Bay Area is unique to travelers through the city of Fremont.

- How will decision-makers and the public determine impacts of the proposed project on the vistas of Coyote Hills Regional Park? Will photographic rendering be prepared to demonstrate the visual impact of the proposed development on the vista (street elevation) towards Coyote Hills from the following locations:
  - the point at which Paseo Padre Parkway crosses the Union Pacific Railroad,
  - heading along Paseo Padre Parkway towards Ardenwood Blvd,
  - Paseo Padre Parkway in the vicinity of the active sports park,
  - Ardenwood Blvd. heading north from the intersection with Paseo Padre Parkway,
  - Ardenwood Blvd. from the Alameda Creek Flood Control Channel looking towards the intersection of Ardenwood Blvd. and Paseo Padre Parkway and towards Coyote Hills Regional Park,
  - and from the hilltops within Coyote Hills Regional Park looking towards the east?
- If this information is provided will the renderings reflect the impacts of mature landscaping elements and increased elevations of the site due to the introduction of fill material?
- What impact will the increased traffic congestion, noise, etc. have on the "nature" experience of visitors to Coyote Hills Regional Park?
- Will the proposed development provide a new source of glare that would adversely affect the daytime views from the tops of the hills at Coyote Hills Regional Park or the Wildlife Refuge?

### **Air Quality:**

- What will be the impact of the increased traffic on air quality? Does the estimate include not only traffic as a result of the proposed 800 homes, but also the proposed churches, active sports fields, and transportation of students from other neighborhoods to new schools within the proposed development or visa-versa, students from the new development to other schools outside the attendance area?
- How will the greenhouse gas emissions generated by the proposed project be analyzed and why are so many housing units being proposed in an area with no transit station?
- What provision for mass transit will be provided to reduce greenhouse gas emissions? Given the location of the proposed development, how likely is it that mass transit would be used by the residents, students, active sports park users, etc.?

### **Biological Resources: Environmental Significance of the Patterson Ranch site:**

The Citizens Committee to Complete the Refuge has followed several proposals to develop the Patterson Ranch area for many years. The lands west of Ardenwood Boulevard were included in the 1990 Refuge Boundary Expansion ("Land Protection Plan, Potential Additions to San Francisco Bay National Wildlife Refuge," based upon Congressional approval of Public Law 100-556, in 1988) for the Don Edwards San Francisco Bay National Wildlife Refuge because of their value to provide an opportunity for the preservation and enhancement of highly significant wildlife habitat for the protection of migratory waterfowl and sensitive and rare wildlife species.

The Baylands Ecosystem Habitat Goals Report (June 2000) in "Segment R – Coyote Hills Area" states:

...The marshes encircled Coyote Hills except to the east where moist grassland bounded the upper margin of the marsh. These grasslands were characterized by springs and seeps, willow groves, seasonal ponds...

...The diked baylands east of Coyote Hills support *the largest remaining willow grove in the baylands ecosystem*, seasonal and diked wetlands, and a permanent freshwater pond. [emphasis added]

Under "Unique Restoration Opportunities" the report states, "...On the eastern side of Coyote Hills, there are seasonal wetlands and willow grove habitat that could be restored or enhanced." Fragments of this historic willow grove exist at the eastern boundary of Coyote

Hills Regional Park and on the Patterson Ranch site. The current alignment of Patterson Slough represents the approximate northeastern boundary of the historic willow grove. Historically the willow grove tapered to the east all the way to Ardenwood Historic Farm.

The Patterson Ranch site is part of a complex of habitats that is unique in its habitat and wildlife diversity, while having a relatively small geographic range. Ardenwood Blvd. has served for decades as a man-made barrier that has protected these important resources from the adverse impacts of encroaching development.

The proposed development will have profound and significant adverse impacts on the opportunity to preserve and recover habitats that are now rare along the bay's edges and to protect wildlife habitat that is currently within the public domain from the adverse impacts of encroaching development.

- What is the rationale for locating the proposed active sports park in the immediate vicinity of an area identified as rare and worthy of preservation and enhancement?
- What is the distance between the proposed parking lot, road alignment, and athletic fields for the proposed junior high school from Patterson Slough?
- How will the adverse impacts of human disturbance on foraging, breeding, and nesting birds within Patterson Slough and the willows across from the active sports park be avoided or minimized?
- How will the adverse impacts of domestic pets on wildlife be avoided?
- How will the adverse impacts of non-native or nuisance species on wildlife and plant communities be avoided?
- It was our understanding from early discussions that there would be no night lighting associated with the proposed active sports park, however, the NOP states, "Sports lighting may be provided for the recreational fields and courts within the Community Park." Why has this changed? How will the adverse impacts of night lighting (light pollution) on wildlife be avoided or minimized?
- How will road kill of wildlife be avoided with the increased traffic that will be created by the proposed development?
- What provisions for restoration of open space lands will be provided?
- How will long term maintenance and management of those lands be provided?
- How will loss of foraging habitat for raptors be mitigated?

#### **Cultural Resources:**

- Have archaeological studies been performed for the entirety of the project site?
- Has coordination with the Native American Heritage Commission occurred?

**Geology, Soils, & Minerals:** The NOP does not provide any information regarding the seismic stability of the site. The State of California Seismic Hazards map dated July 2, 2003, indicates

the Patterson Ranch area may be susceptible to liquefaction. The Association of Bay Area Governments (ABAG, <http://www.abag.ca.gov/bayarea/egmaps/mapsba.html>) indicates the site may be subject to strong to violent shaking depending upon which earthquake fault is activated.

- What measures will be required to meet state standards for construction of the elementary and junior high schools?
- Does any potential liability exist for the city or school district should earthquake damage or public injury result within the project area (e.g. locating developed areas near the existing utility line easements, area subject to liquefaction, etc.)?
- Are on-site soils (i.e. excavated materials from the proposed bioswale) appropriate for use in developed areas given the sites liquefaction potential and seismic hazard potential?

**Hazards & Harzardous Materials:** The Coyote Hills Regional Park Draft Land Use Plan, February 8, 2005, indicates that in addition to the Pacific Gas and Electric high-tension lines, there is an adjacent easement for Shell Oil Company for an 8" non-liquid gas line.

- Is the Shell Oil Company gas line still active?
- Do the utility easements pose any public safety hazards for the active sports park in the event of an earthquake?
- What is the estimated evacuation time for the lands east of Ardenwood Blvd. in the event of an emergency?
- The NOP indicates much of the land is within a flood hazard zone, the site is protected from flooding by levees, and the site is potentially subject to liquefaction and seismic hazards. Recently, the governor has signed legislation that will hold cities within the Sacramento area partially liable if flooding occurs and the city or county has permitted development in a flood zone. What liability will Fremont have in the event of a natural disaster, if development is approved at this site?

#### **Hydrology & Water Quality:**

The proposed development site lies within a Federal Emergency Management Agency (FEMA) identified 100 year flood zone. To mitigate the flood zone hazard the developer is proposing to introduce 18,000 cubic yards of fill to increase the elevations of the areas proposed for development.

Coyote Hills Regional Park lies immediately adjacent to the Patterson Ranch site. In the past the developer has proposed run-off from the developed site would be directed through the lands west of Ardenwood Blvd. into Pelican Lake (Dust Marsh) and eventually through the Coyote Hills drainage system into the Alameda Creek Flood Control Channel.

What impact will the addition of flows from the proposed development have on the hydrological regime of the Coyote Hills ecosystem? For example:

- Will there be an increase in winter and spring levels of ponding within Coyote Hills Regional Park?
- Will the addition of year-round surface flows from the proposed development have any impacts on the management of the Coyote Hills Regional Park water regime?
- Where will surface run-off from the lands west of Ardenwood be directed?
- What impact will the proposed hydrological and topographical modifications have on Patterson Slough?
- Hydrocarbons and heavy metals from road run-off, fertilizers, herbicides, and pesticides can build up in wetlands over time. The developer proposes construction of a bioswale to address water quality issues. Who has long-term responsibility for maintaining and managing the bioswale area? Will bioaccumulation within the swale area or areas immediately downstream of the swale pose any health risks to wildlife? How will the efficacy of the bioswale be monitored?
- How will the bioswale be constructed and how will down-cutting be avoided?
- What will be the depth of excavation for the proposed swale and will groundwater be encountered due to the excavation?
- Will the proposed development impact the manner in which Coyote Hills Regional Park and the Alameda County Flood Control and Water Conservation District (ACFCWCD) manage the ponding or movement of water within the South, Main, and North Marshes of the Park?
- The San Francisco Bay Conservation and Development Commission (BCDC) has implemented a Climate Change Planning Project to identify and report on the impacts of climate change on the San Francisco Bay. As part of this project, BCDC has produced maps which delineate shoreline areas that may be impacted by sea level rise: <http://www.bcdc.ca.gov/index.php?cat=56> What impact will sea level rise have on the proposed development – e.g. could sea level rise require tidegates that discharge waters from Coyote Hills Regional Park be replaced at higher elevations and if so, who would bear the financial responsibility for accomplishing this task? What would the consequences be to the developed areas if this does not occur?
- Is groundwater rising within the Coyote Hills general area and if so, what impacts will this have on the developed areas and would any remedial measures be required within Coyote Hills Regional Park because of the proposed development?

**Land Use & Planning:** The General Plan (p. 3-17, p. 3-27) states:

Portions of the western edge of the Planning Area have been targeted by the National Wildlife Refuge for purchase. The areas identified for possible acquisition include open space and agricultural uses [*Patterson Ranch west of Ardenwood Blvd.*] as well as one parcel planned for industrial use [*Cargill parcel located to the south of Patterson Ranch*].

*Virtually all of the city's Fundamental Goals are relevant to land use, but the following are perhaps the most relevant:*

*...F7 – AN OPEN SPACE FRAME THAT INCLUDES THE HILLFACE, BAY WETLANDS AND GATEWAYS. [emphasis added]*

- Earlier discussions have indicated the lands west of Ardenwood Blvd. have been identified as having value for inclusion within the Wildlife Refuge, and were in fact identified as a priority area. Unfortunately funding has not been available for acquisition. The Goals Project has identified unique restoration opportunities on the land west of Ardenwood Blvd. How does the proposed development recognize the important habitat and wildlife values of the lands west of Ardenwood Blvd. in placing school grounds and active sports parks in proximity to important natural resources?

The NOP states all of the project area is zoned Agricultural. Approximately 292 acres of the 428 acres is designated Open Space – Urban Reserve, and that 131 acres of the site are currently designated Private Open Space. Under the project description, the NOP states the proposed use for Site 4 is “Open Space/no change.”

- Do areas within Site 4 currently have the Open Space – Urban Reserve designation and will that designation be amended to remove the “Urban Reserve” component?
- Will a conservation easement or some other vehicle that prevents future development of the “open space” areas be enacted, in other words, how will the open space areas be protected from any future development?
- The NOP indicates “open space” areas may be transferred to the East Bay Regional Park District or to the Don Edwards San Francisco Bay National Wildlife Refuge, or other entity. We believe it is imperative the lands be transferred to one of these two entities. How will the city guarantee this transfer will occur?

**Noise & Vibration:**

- How will substantial and permanent increases in ambient noise levels resulting from the proposed project impact important adjacent wildlife areas?
- Will substantial temporary or periodic increases in the ambient noise levels in the project vicinity arise once the project is completed? What impacts would this have on wildlife in adjacent areas?

**Parks & Recreation:** As open lands become scarce in the Bay Area, other communities are adopting joint use agreements for parks, recreational facilities, and schools.

- Given the regional environmental significance of the lands west of Ardenwood Blvd., why isn't joint use between the school district and the city integrated into the development plan?
- Given the environmental sensitivity of the area, why can't a passive park be substituted instead?

Of the respondents to the online General Plan survey (Oct 2007), 85% of the respondents had identified parks and open space as being a "Very High" or "High" priority. In that same survey, 56% had visited Coyote Hills Regional Park, and 43% had visited the Alameda Creek Trail, in the past year and planned to visit again. Coyote Hills Regional Park ranked second only to Central Park in the number of visitors. Clearly Fremont residents appreciate and use these parks. Coyote Hills Regional Park is immediately adjacent to the proposed development.

- Will the park experience of visitors to Coyote Hills Regional Park be reviewed under this DEIR?
- How will you ensure that the park users' experience of nature, wildlife, serenity, beauty, etc. is not degraded by encroaching development?
- What impact will the proposed development have on the maintenance, management, and policing?

**Public Services (Fire, Police):** There is no indication there will be any provision for increased fire and police services.

- What station will be the first responder in the event of an emergency?
- What is the estimated response time for emergency personnel or police?
- What impact will the proposed development have on response times (e.g. staffing, etc.) for the rest of the city?
- What impact will the proposed project have on the City's ability to maintain or improve levels of service within existing areas of the city (including issues of road maintenance in addition to emergency services)?

**Public Utilities:**

- What impact, if any, will recent lawsuits regarding the exports of water from the Delta have on the City of Fremont's available water supply? Would the projected water demands of this development proposal have any impact on existing development within the city?

**Schools & Libraries:**

Public schools have been an issue of great concern almost since the day development of the Northern Plains Area began. These issues have ranged from safe student access to schools to

overcrowding. Therefore, issues of access to public schools are of major concern to the community and to the American High School attendance area as well. For these reasons it is important the DEIR address the following concerns:

- Will the elementary school and the junior high school be built immediately or will the construction of the schools be dependent upon occupation of constructed housing units? If so, what number of housing units would need to be occupied before the construction of the schools begins?
- It was our initial understanding the developer would actually construct the elementary school. The language of the NOP however states, "The school would be constructed, owned and operated by the Fremont Unified School District." Who will actually construct the elementary school site? The current landowners? Future landowner/developers? The school district? If the school district, how will the level of funding be determined and will that funding include provisions for inflation should the school not be built immediately?
- If the school district is responsible for the construction of the elementary school, it is imperative they have detailed and site specific information necessary to determine the costs of constructing schools in this area given the identification of flood hazard, liquefaction, earthquake hazard, etc. Have site specific borings or testing of the subsurface materials been conducted to determine the liquefaction or lateral spreading hazards of the proposed school sites? If not, will these studies be conducted for incorporation into the DEIR?
- The current development proposal locates the elementary and junior high school on the west side of Ardenwood Blvd., a four-lane road with a speed limit of 40 mph. Ardenwood Blvd. connects the cities of Fremont, Newark, and Union City, and provides access to Highway 84, which in turn connects to the Dumbarton Bridge and the Nimitz Freeway (Highway 880). Paseo Padre Parkway is another four-lane road in close proximity to the proposed school site and also has a 40 mph speed limit. How will the safety of school children who walk or ride their bikes to and from school be ensured? How will their safety be insured during non-school hours (e.g. before or after school hours, weekends, etc.)?
- The NOP indicates the elementary school would be constructed sometime in the near future. What happens if the school district decides the junior high school site is not the proper location to address its housing needs for junior high school students within the district? How will the city guarantee that sites proposed for schools will be used only for school construction and not for some other kind of development in the event that the Fremont Unified School District elects not to construct the proposed schools?
- What junior high and high school would students living within the proposed development attend? Thornton Junior High School and American High School are identified by the school district as exceeding their capacities. The school district has recently approved a "first come first served" policy where new students may be overloaded to other schools within the

district if their home school is impacted. Is this how the school district would deal with the issue of overcrowding within the American High School attendance area? What is the farthest distance overloaded students might have to travel?

- Why can't the City own the lands for the schools and lease the lands to the school district to facilitate multiple uses of the playing fields, parking lots, and other facilities when not in use by the schools?

**Transportation & Circulation:** The current development plan locates the elementary school and junior high schools on the west side of Ardenwood Blvd., a four-lane road with a speed limit of 40 mph. Paseo Padre Parkway is another four-lane road in the vicinity of the proposed school locations, and provides access to the Dumbarton Bridge.

- How many additional daily car trips will be added to the area as a result of the total project (i.e. housing, commercial, schools – including overload student trips, churches, active sports park, etc)?
- What impact would the imposition of the mandatory 25 mph speed zone for crossing school children have on the level of service of this major intersection?
- The NOP states the elementary school would serve 600-840 students. The Fremont Unified School District (FUSD) Student Housing Plan, June 2, 2007 indicates the Villa D'Este and Patterson Ranch developments would generate approximately 300-400 students. Forest Park Elementary School has an excess of approximately 222 students. Is it possible students from beyond the Villa D'Este and Forest Park attendance areas might attend the proposed elementary school? What is the greatest distance that might be travelled by a student to attend the proposed elementary school?
- What impact will parents dropping off their students have on traffic congestion experienced during school hours, or during school sponsored events?
- Special school sponsored events (e.g. Back-to-School nights, Open House, promotion ceremonies, etc.) could lead to temporary short term parking deficiencies. How can parking for infrequent events be accommodated without increasing parking lot size? If not addressed what impact will this have on the surrounding industrial areas, and Coyote Hills Regional Park?
- What impact will the proposed project have on access to Coyote Hills Regional Park during and after project construction?

**Cumulative Impacts:** The cities of Fremont, Newark, and Union City are experiencing tremendous development pressure and development proposals have been or will soon be submitted for some of the remaining large parcels of undeveloped lands.

- In addition to adjacent development such as the Tupelo parcel, will the cumulative impacts of other large projects such as The Globe, Area 3 & 4, the A's Stadium, and the Cargill site be considered?

- Ardenwood Blvd. has served as an important man-made buffer for decades, protecting the important resources of Coyote Hills Regional Park from the adverse impacts of surrounding development. Will the cumulative negative impacts to the important resources of Coyote Hills Regional Park and the surrounding lands that result from the violation of this buffer be analyzed? How will the negative impacts be mitigated?
- How will cumulative impacts to all of the environmental factors listed in the NOP be identified and mitigated?

**Alternatives to be Considered:** CEQA requires the city review the No Project and Proposed Project Alternatives. Statements have been made previously that the developer would not propose increased housing units, therefore Citizens Committee to Complete the Refuge requests that increase housing units not be considered as an alternative for the purposes of the DEIR. What would be the purpose of reviewing such an alternative?

The environmental sensitivity of the lands west of Ardenwood Blvd. is mentioned above. According to a document previously prepared for the city, "Northern Plain Planning Area Initiative Evaluation," dated June 2006, the maximum housing units under the No Project Alternative would be 266 units. Is this the correct number? The number of housing units to be built under the Proposed Project Alternative would be 800 units. Will an alternative that analyzes the impacts of an intermediate number of housing units be considered? This would provide information regarding impacts of an intermediate level of housing units on the environmental factors.

In addition, we have serious concerns about biological, safety, and traffic concerns with the proposed development configuration. Will the city analyze an alternative that locates all development to the east of Ardenwood Blvd.?

We respectfully request the city analyze two alternatives in addition to the No Project, and Proposed Project alternatives:

- An alternative that moves all project elements to the east of Ardenwood Blvd (i.e. schools, churches, and active sports park) with joint use of playing fields, parking, etc. between the active sports park and schools, and analyzes an intermediate housing density, and
- an alternative that moves all project elements to the east of Ardenwood, with joint use of the school site, intermediate housing density, but allows a passive-only park located to the west of Ardenwood Blvd and along Ardenwood Blvd.

We believe these alternatives are consistent with growing concerns about the importance of incorporating schools into neighborhoods (Safe Routes to Schools), would address concerns

voiced by the surrounding community since the early 1990's about the adverse impacts of additional high housing densities within the community (especially when considered in light of the newly added 276 units from the Villa D'Este immediately adjacent to the project, and the existing 5,000+ units in the Ardenwood/Forest Park developments), and would lessen the significant adverse environmental impacts of the proposed project.

Lastly, while we realize this is not the forum to address concerns regarding the proposed Development Agreement, we are extremely concerned about the proposed duration of fifteen years. We hope any approved agreement will provide enough flexibility to enable the City to modify the project in response to community issues of public safety (e.g. need for additional public services police, fire, etc.), flood hazards, seismic hazards, traffic hazards, endangered species issues should they arise, etc.

Thank you for the opportunity to provide comments. The Citizens Committee to Complete the Refuge has participated in this process since the early 1990's and will continue to do so.

Sincerely,

Florence LaRiviere  
Chairperson

cc: Mendel Stewart, Project Leader DESFBNWR, USFWS  
Mike Monroe, EPA  
Jane Hicks, Chief, Regulatory Branch, USACE  
Mark D'Avignon, South Section Chief, USACE  
Carl Wilcox, Chief, Water Branch, CDFG  
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Alameda County Flood Control and Water Conservation District  
Bob Dolye, AGM of Land Acquisition, EBRPD  
Mike Anderson, AGM of Planning & Stewardship, EBRPD  
Joe DiDonato, Stewardship Manager, EBRPD  
Brad Olson, Environmental Programs Manager, EBRPD  
Bay Area Air Quality Management District  
Federal Emergency Management Agency  
Sierra Club  
Alameda Creek Alliance  
California Native Plant Society  
Ohlone Audubon Society  
Greenbelt Alliance

Transportation and Land Use Coalition  
Native American Heritage Commission  
Bob Wasserman, Mayor of Fremont  
Fremont City Council  
City of Fremont Planning Commission  
Fred, Diaz City Manager  
Douglas Gephart, Superintendent, Fremont Unified School District  
Jeff Schwob, Planning Director  
Jill Keimach, Community Development Director