

# San Francisco Bay Conservation and Development Commission

455 Golden Gate Avenue, Suite 10600, San Francisco, California 94102 tel 415 352 3600 fax 415 352 3606

June 3, 2016

## Application Summary

(For Commission consideration on June 16, 2016)

**Number:** BCDC Permit Application No. 1982.026.08  
**Date Filed:** June 3, 2016  
**90th Day:** September 1, 2016  
**Staff Assigned:** Tinya Hoang (415/352-3622; tinya.hoang@bcdc.ca.gov)

### Summary

**Applicants:** Oracle America Inc., Centrum Owners Association, and Oracle Corporation

**Location:** An approximately 4.8-acre site located north of Oracle Parkway, east of U.S. Highway 101, in the City of Redwood City, San Mateo County. Belmont Slough is located along the site's northern shoreline, and an office park and lagoon is located south of the site, across Oracle Parkway.



**Project:** The proposed project involves the construction of a new high school, parking lot and associated outdoor spaces. The school building would be occupied by the Design Tech High School, which is expected to have 550 students and 30 faculty and staff. The project includes, partially within the Commission’s 100-foot shoreline band jurisdiction, demolishing an existing parking lot, raising a section of levee and grading of the site, and constructing a 34,300-square-foot (footprint), approximately 31- to 38-foot-tall, two-story school building, a 35-space parking lot, and a 20-car student drop-off lane (Exhibit A).

The proposed project also includes public access improvements, including an improved 12-foot-wide Bay Trail path on top of the raised levee, additional new and improved public paths, Bay Trail entry points, a plaza area, improved exercise nodes, various types of small recreational spaces (for sitting, education, contemplation, and picnicking), landscaping, bicycle racks, relocated public access parking, and other public amenities. The school’s patio and parking lot area would be available for the public’s use outside of school hours.

#### **Issues**

**Raised:** The staff believes that the application raises three primary issues regarding the project’s consistency with McAteer-Petris Act and the San Francisco Bay Plan (Bay Plan): (1) whether the proposed public access would be the maximum feasible consistent with the project and would be constructed in a manner that would maximize opportunities for public use and minimize impacts to wildlife; (2) whether the proposed project would be designed and managed to avoid impacts from sea level rise and flooding; and (3) whether the proposed project would maximize views to the Bay and shoreline.

#### **Background**

The proposed project site is currently subject to two BCDC permits: (1) BCDC Permit No. 1982.026.06; and (2) BCDC Permit No. 1986.009.01.

BCDC Permit No. 1982.026.06 generally covers the area along the shoreline adjacent to Belmont Slough and Oracle Parkway. The original authorization for BCDC Permit No. 1982.026 allowed the construction of public access improvements associated with the redevelopment of the area between Oracle Parkway and Marine Parkway into an office park, which is now occupied by Oracle Corporation. Until about 1986, the area was occupied by the Marine World,

Africa U.S.A. Amusement Park. The BCDC permit required, in part, a continuous public pathway, recreation areas, public parking spaces and other public amenities along the shoreline. In 1998, Amendment No. Five to BCDC Permit No. 1982.026 authorized, in part, the construction of a parking lot and a portion of the Bay Trail, which are currently located at the proposed school site. The authorization of the proposed school project would result in Material Amendment No. Eight to BCDC Permit No. 1982.026.

The other BCDC permit that pertains to the site is BCDC Permit No. 1986.009.01. That permit authorized the construction of a levee along the shoreline adjacent to Belmont Slough, and was issued to the City of Redwood City, which has a drainage, waterway, and levee easement across the site. With the proposed project, a section of this levee would be raised to address flooding from future sea level rise.

## Project Description

### Project

**Details:** The applicants, Oracle America Inc., Centrum Owners Association, and Oracle Corporation, describe the proposed project as follows:

#### **In the 100-foot shoreline band:**

1. Create a new approximately 4.8-acre parcel from portions of three existing parcels (Lot 7, Parcel 3 and Oracle Parkway), and modify the southern boundary of Lot 8 to accommodate relocated public parking spaces;
2. Demolish an existing parking lot, remove 49,833 square feet of landscaped area, remove an additional 13,125 square feet of ice plant, and remove three exercise nodes;
3. Construct, use and maintain in-kind an approximately 4,000-square-foot portion of an approximately 34,300-square-foot (footprint), approximately 31 to 38 feet tall, two-story school building;
4. Install, use and maintain in-kind approximately 63,781 square feet of landscaped areas, which includes 2,165 square feet of bioretention areas;
5. Install, use and maintain in-kind a portion of a storm water management system;
6. Construct, use and maintain in-kind an approximately 1,152-square-foot plaza with seat walls, and approximately 2,900 square feet of patio area with tables;
7. Construct, use and maintain in-kind an approximately 2,058-square-foot portion of an approximately 20,787-square-foot new 35-space parking lot and student drop-off area, with associated lighting, and install a bike locker;
8. Raise and maintain in-kind the elevation of an existing levee to as high as 14 feet NAVD88 and raise other portions of the site, by grading over an approximately 2.67-acre portion of the 4.8-acre site;

9. Construct, use and maintain in-kind an approximately 1,124-foot-long, 10-foot-wide asphalt public path with a two-foot-wide decomposed granite shoulder and an adjacent post rope fence to enhance an existing section of the Bay Trail located on the levee; and
10. Construct, use and maintain in-kind additional public access improvements including: approximately 719 linear feet of additional new and/or improved paved public paths, ranging from 5 to 8 feet wide; an enhanced 2,356-square-foot Bay Trail entry point to the east of the school; three exercise nodes; two seating areas; three other gathering spaces for education, contemplation, and picnicking; and other amenities (including benches, tables, decorative boulders, trash receptacles, drinking fountains), interpretive and wayfinding signage, bicycle racks and a portion of a relocated public parking space.

### **Public**

#### **Access:**

The proposed project would result in a net increase of approximately 71,712 square feet (1.6 acres) of new public access area, of which approximately 26,900 square feet would be permanently guaranteed. The remaining approximately 44,812 square feet of public access area would consist of the school patio area, the parking lot, and the student drop-off area, which would be open to the public outside of school hours (5:00 pm to sunset on weekdays, and from sunrise to sunset on weekends and holidays). Public access improvements would be developed within existing and proposed public access areas and would include an improved section of the Bay Trail, a Bay Trail plaza area, additional new and improved public pathways including three Bay Trail entry points, landscaping, three exercise nodes (to replace three existing exercise nodes), two seating areas, three other recreational “nodes” (for picnicking, education, and contemplation), 14 relocated public parking spaces, 11 public bicycle racks, a basketball court within the parking lot, wayfinding and interpretive signage, and other public amenities (Exhibit C).

### **Schedule**

#### **and Cost:**

The applicants propose to begin construction in June 2016, and continue for a period of 13 months. The estimated total project cost is approximately \$31,171,000.

## **Staff Analysis**

- A. **Issues Raised:** The staff believes that the application raises three primary issues regarding the project’s consistency with McAteer-Petris Act and the San Francisco Bay Plan (Bay Plan): (1) whether the proposed public access would be the maximum feasible consistent with the project and be constructed in a manner that would maximize opportunities for public use and minimize impacts to wildlife; (2) whether the proposed project would be designed and managed to avoid impacts from sea level rise and flooding; and (3) whether the proposed project would maximize views to the Bay and shoreline.

1. **Public Access.** Section 66602 of the McAteer-Petris Act states, in part: "...existing public access to the shoreline and waters of the...[Bay] is inadequate and that maximum feasible public access, consistent with a proposed project, should be provided." In addition, the Bay Plan Public Access Policy 1 states, in part, "a proposed fill project should increase public access to the Bay to the maximum extent feasible...." Policy 2 states, in part, "...maximum feasible public access to and along the waterfront...should be provided in and through every new development in the Bay or on the shoreline, whether it be for housing, industry...." Policy 4 states, in part, "public access should be sited, designed and managed to prevent significant adverse effects on wildlife. To the extent necessary to understand the potential effects of public access on wildlife, information on the species and habitats of a proposed project site should be provided, and the likely human use of the access area analyzed." Policy 7 states, in part, "public access improvements...should be designed and built to encourage diverse Bay-related activities and movement to and along the shoreline, should permit barrier free access for persons with disabilities to the maximum feasible extent, should include an ongoing maintenance program, and should be identified with appropriate signs." Policy 9 states, "access to and along the waterfront should be provided by walkways, trails, or other appropriate means and connect to the nearest public thoroughfare where convenient parking or public transportation may be available. Diverse and interesting public access experiences should be provided which would encourage users to remain in the designated access areas to avoid or minimize potential adverse effects on wildlife and their habitat." Policy 12 states, "the Public Access Design Guidelines should be used as a guide to siting and designing public access consistent with a proposed project. The Design Review Board should advise the Commission regarding the adequacy of the public access proposed."

Existing public access areas at the site are required by BCDC Permit No. 1986.009.01 and BCDC Permit No. 1982.026.06 (Exhibits A and B). BCDC Permit No. 1986.009.01 requires dedicated public access on top of the levee, which runs along the northern boundary of the site. The existing configuration of the public access area at the proposed school site was specifically required in Amendment No. Five of BCDC Permit No. 1982.026, which authorized the construction of a parking lot, basketball court, and soccer field at the same site. However, only the parking lot was built. A 10-foot-wide segment of Bay Trail path exists on top of the existing levee, and three exercise nodes are located behind it. These existing improvements are part of a larger system of trail and public access improvements that are currently required under BCDC Permit No. 1982.026.06 and that generally extend between Belmont Slough and Oracle Parkway. The available space to build the proposed school and to provide additional public access is constrained by existing public access requirements at the site, as well as by the narrow width of the land between the shoreline and the road.

- a. **Proposed Public Access.** The proposed project would involve, partially within the Commission's 100-foot shoreline band jurisdiction, demolition of the existing parking lot, and construction a 34,300-square-foot, two-story school building (with a total floor area of 64,000 square feet), a 35-space parking lot, and a 20-car student drop-off lane. The school building and the parking and student drop-off facilities would be constructed within the footprint of the parking lot, basketball court, and

soccer field that were authorized in Amendment No. Five of BCDC Permit No. 1982.026. The new school is expected to have 550 students and 30 faculty and staff, and to be open year-round, Monday through Friday from approximately 8:00 am to 5:00 pm. The proposed project also involves raising the existing levee to address sea level rise.

The applicants propose to provide a net increase of approximately 71,712 square feet (1.6 acres) of public access area. All areas within the proposed limits of work that are not occupied by the school building's footprint and the front of the building would be available for public access, as shown on Exhibit B. The applicants propose to permanently guarantee approximately 28,000 square feet of new public access area, but to remove approximately 1,100 square feet of existing dedicated public access in order to re-configure the sidewalk on Oracle Parkway. This would result in a net increase of 26,900 square feet of dedicated public access. In addition, the applicants propose that the school patio, parking lot, and student drop-off area would be open to the public from 5:00 pm to sunset on weekdays, and from sunrise to sunset on weekends and holidays. The parking lot and student drop-off area would be available for recreational uses, such as basketball, street hockey, and open-air markets and events, during the public hours specified above. Signage would be installed in order to inform the public of the hours of use. While these additional areas would not be permanently dedicated solely for public access use, they would result in approximately 44,812 square feet of additional area that would be available to the public on weekday evenings, weekends and holidays. These areas are identified as "proposed required public access" in Exhibit B. Therefore, the proposed project would result in a total increase of public access area by approximately 71,712 square feet, of which 26,900 square feet would be permanently guaranteed. Although the existing authorization for the basketball court, soccer field, and parking lot would be superseded by the proposed project, the public access area that was dedicated in association with that authorization will remain in place.

Within the proposed and existing public access areas, public access improvements would include: an improved approximately 1,124-foot-long, 12-foot-wide portion of the Bay Trail on top of the raised levee; a total of approximately 993 linear feet of new and/or improved public paths and sidewalks ranging from five to eight feet (in some cases, existing sidewalks would be narrowed to a five-foot width from an eight-foot width); three Bay Trail entry points from the sidewalk on Oracle Parkway; a Bay Trail plaza area behind the school; three exercise nodes (to replace three existing exercise nodes); two seating areas; three other gathering spaces for education, contemplation and picnicking; 11 public bicycle racks; 71,130 square feet of landscaping; a basketball court within the parking lot; interpretive and wayfinding signage; and other public amenities (including benches, tables, garbage receptacles, and drinking fountains) (Exhibit C). The improvements would also include the relocation of fourteen public parking spaces, (originally required in Amendment No. Five) to the east, on Oracle Parkway. All of the proposed public facilities would comply with the Americans with Disabilities Act (ADA) requirements and would be maintained by the applicants.

The proposed project would include two parcel or lot line reconfigurations: a new 4.8-acre parcel would be created for the proposed school site, and the southern boundary of Lot 8 would be modified in order to accommodate the relocated public parking spaces. These parcel or lot line changes constitute a subdivision of land for purposes of the Subdivision Map Act and, in addition, are considered a “substantial change in use of land” for purposes Section 66632(a) of the McAteer-Petris Act and Section 10125(b)(5) of the Commission's administrative regulations, because the reconfiguration of the parcels would result in opportunities for different land uses that could potentially affect present and/or future public access to or along the shoreline of Belmont Slough. As a result, this subdivision of land requires a permit under the McAteer-Petris Act. The reconfigurations that will result from this subdivision of land are expected to contribute to improved public access at the proposed school site.

- b. **Compatibility with Wildlife.** The improved Bay Trail would be located adjacent to a wildlife refuge priority use area within Belmont Slough. The increased use of the Bay Trail could potentially impact wildlife in the adjacent marsh, which is suitable habitat for endangered species such as the salt marsh harvest mouse and the California Ridgway's Rail. To minimize disturbance to wildlife, a rope post fence would be installed to keep recreational users and pets outside of the marsh. Currently, no signage is proposed to inform recreational users of the sensitive wildlife habitat. The applicants state that the rope post fence would be sufficient to keep people and pets out of the marsh. The applicants and Commission staff have discussed that, should problems arise with people and/or pets entering the marsh, additional measures could be taken, including installation of signage. The proposed project would also involve the removal of ice plant from upland areas adjacent to the marsh, and replanting of those areas with marsh transition zone vegetation.
- c. **Past Projects.** In evaluating whether the proposed public access is the maximum feasible consistent with the project, the Commission looks, in part, to its past actions on comparable projects. In 2005, the Commission issued BCDC Permit No. M2005.019.00 for the construction of a 22,500-square-foot, one-story, 25-foot-high community library, partially within the Commission's jurisdiction, located nearby, adjacent to Belmont Slough, in the City of Redwood City (Table 1 below). The project included the dedication of approximately 81,502 square feet of public access area, and installation of two public paths totaling 283 linear feet, approximately 31,286 square feet of public outdoor decks adjacent to the library structure, landscaping, and other public amenities. In 2009, the Commission issued BCDC Permit No. M2006.008.01 to construct the Tidewater Aquatic Center in the City of Oakland, which included two one-story 28-foot-high boat storage buildings (9,700 square feet total), a 3,000-square-foot, two-story, 24-foot-high building, a floating dock, and shoreline protection. The project provided a total of 54,610 square feet of public access area, and additional public access improvements, including a 460-foot-long public path, an entry plaza, two boat staging areas, and signage.

Project	Building Dimensions	Public Access Area Provided	Public Improvements Provided
Proposed Design Tech High School	34,300-square-foot building	71,712 square feet	1,124 feet of improved Bay Trail, additional paths, landscaping, three improved exercise nodes, total of eight sitting/gathering spaces, plaza, signage, other amenities, public use of patio and parking lot with basketball court outside school hours
Redwood Shores Branch Library (BCDC Permit No. M2005.019.00)	22,500-square-foot building	81,502 square feet	283 feet of path, 31,286 square feet of outdoor decks, landscaping, signage, other amenities
Tidewater Aquatic Center (BCDC Permit No. M2006.008.01)	Two buildings totaling 12,700 square feet	54,610 square feet	460 feet of path, entry plaza, two boat staging areas, landscaping, signage

**Table 1. Summary of Projects and Public Access Provided**

*The Commission should determine whether the proposed public access is the maximum feasible consistent with the project and would be constructed in a manner that maximizes opportunities for public use and minimizes impacts to wildlife.*

- 2. Sea Level Rise and Flooding.** The Bay Plan Public Access Policy 5 states, “public access should be sited, designed, managed and maintained to avoid significant adverse impacts from sea level rise and shoreline flooding.” Policy 6 states, in part, “whenever public access to the Bay is provided as a condition of development, on fill or on the shoreline, the access should be permanently guaranteed.... Any public access provided as a condition of development should either be required to remain viable in the event of future sea level rise or flooding, or equivalent access consistent with the project should be provided nearby.” Climate Change Policy 2 states, in part, “when planning shoreline areas or designing larger shoreline projects, a risk assessment should be prepared by a qualified engineer...the risk assessment should identify all types of potential flooding, degrees of uncertainty, consequences of defense failure, and risks to existing habitat from proposed flood protection devices.” Climate Change Policy 3, states, in part, “...within areas that a risk assessment determines are vulnerable to future shoreline flooding that threatens public safety, all projects...should be designed to be resilient to a mid-century sea level rise projection. If it is likely the project will remain in place longer than mid-century, an adaptive management plan should be developed to address the long-term impacts that will arise based on a risk assessment using the best available science-based projection for sea level rise at the end of the century.”

The proposed project is located within an approximately 900 feet long site and is not considered a larger shoreline project given the scale of the project and the site context. Therefore, a formal risk assessment was not prepared. However, the applicants designed the project to address future sea level rise and provided information about the risk of potential flooding.

The proposed project site is currently protected from the 100-year flood within Belmont Slough by a levee. According to the latest FEMA flood maps (updated July 16, 2015), the 100-year flood elevation within Belmont Slough is 10 feet NAVD88. The expected life of the proposed project is 50 years, and the applicants are using a sea level rise projection of 36 inches through year 2070 in their design. Therefore, the projected water elevation for the 100-year flood by year 2070 is approximately 13 feet NAVD88.

The proposed project would include raising the existing levee and constructing the improved Bay Trail on top of the levee and providing additional public access areas and improvements behind it. The majority of the length of the levee within the proposed project limits (approximately 837 feet out of 1,124 feet) would be raised to 14 feet NAVD88. This elevation is equivalent to the 100-year flood, plus 36 inches of sea level rise and one foot of free board (Exhibit D). The applicants would enter a maintenance agreement with the City of Redwood City to maintain the levee pathway and elevation. Therefore, the majority of the Bay Trail path on top of the levee would be designed and maintained to be above the projected flooding and sea level rise elevations for the life of the project. The raised levee would also provide protection to the inland public access areas from flooding coming directly from the north of the site.

However, the proposed levee elevation would drop below 14 feet NAVD88 at the eastern and western project boundaries in order to conform to the adjacent levee elevations. To the west, the adjacent levee elevation is approximately 12.3 feet NAVD88. To the east, the adjacent levee elevation is approximately 12.1 feet NAVD88. If measures are not taken to raise the levee across the entire shoreline in the future, the proposed project site and public access areas could potentially experience flooding within the expected life of the project, due to overtopping at the adjacent areas and the project boundaries. For example, overtopping of the adjacent levee to the east could begin to occur when the water levels are above approximately 12.1 feet NAVD88, which is equivalent to approximately 2.1 feet (25 inches) of sea level rise on top of the current 100-year flood. Based on the sea level rise projections from the National Research Council's 2012 report,<sup>1</sup> this water elevation could occur by approximately mid-century. Further, by year 2070, the 100-year flood is projected to be approximately 13 feet NAVD88, which would result in approximately 0.9 feet of overtopping at the adjacent levee to the east, and in overtopping at the project boundaries.

The proposed site is graded such that water would flow towards the right-of-way. The on-site drainage connects to the public storm water system at Oracle Parkway, which discharges into the lagoon in the center of the Oracle office park. The lagoon is connected to Belmont Slough via two culverts with flap valves and a force main. The applicants' engineer states, "...the proposed piping has the capacity to convey greater than a 100-year storm [rainfall event with 1% annual chance of occurring] with the proposed site conditions. Should the Oracle Parkway storm drains back up, there is ample storage available in the on-site piping before inlets would experience reverse flow and water would surface to flow in the overland release paths to the street."

---

<sup>1</sup> Sea-Level Rise for the Coasts of California, Oregon, and Washington: Past, Present, and Future (2012). [http://www.nap.edu/catalog.php?record\\_id=13389](http://www.nap.edu/catalog.php?record_id=13389)

However, the on-site storm draining piping is not specifically designed for intake and conveyance of levee overtopping and tidal water influx, and in the absence of volumetric information, the storm drainage system's capacity to convey tidal flood waters cannot be accurately determined. The applicants' engineer also states, "Runoff/flooding that is not captured in the off-site storm drain piping is conveyed in the curb and gutter street section. Given the location of the street high point, surface water drains either to the east or west in Oracle Parkway or toward the south...."

A sea level rise vulnerability assessment for San Mateo County was recently conducted by the Sea Change San Mateo County Initiative.<sup>2</sup> Flood mapping information from this assessment shows that flooding originating from other areas in the city could affect the proposed site when water levels are at 48 inches of sea level rise above today's Mean Higher High Water (equivalent to approximately 11.5 feet NAVD88 or the 100-year flood by mid-century). Therefore, complete flood protection of the proposed public access areas may necessitate a larger flood protection strategy beyond the proposed project site and the immediately adjacent areas. While the applicants propose to develop an adaptation plan in coordination with the City of Redwood City to address any *additional* future sea level rise or FEMA revisions post-construction, these adaptive measures would involve building the on-site shoreline protection higher and not necessarily address flooding originating from surrounding areas that could occur by mid-century. The applicants' engineer states, "Redwood City has stated that they are on alert for future direction from FEMA to reconstruct the necessary portions of the City levee system that may be deemed inadequate due to sea level rise...."

*The Commission should determine whether the proposed project would be designed and managed to avoid impacts from sea level rise and flooding.*

3. **Appearance, Design, and Scenic Views.** The Bay Plan Appearance, Design, and Scenic Views Policy 2 states, in part, "all bayfront development should be designed to enhance the pleasure of the user or viewer of the Bay. Maximum efforts should be made to provide, enhance, or preserve views of the Bay and shoreline, especially from public areas, from the Bay itself, and from the opposite shore." Policy 4 states, in part, "structures and facilities that do not take advantage of or visually complement the Bay should be located and designed so as not to impact visually on the Bay and shoreline. In particular, parking areas should be located away from the shoreline." Policy 8 states, in part, "shoreline developments should be built in clusters, leaving areas open around them to permit more frequent views of the Bay. Developments along the shores of tributary waterways should be Bay-related and should be designed to preserve and enhance views along the waterway, so as to provide maximum visual contact with the Bay." Policy 14 states, in part, "views of the Bay from vista points and from roads should be maintained by appropriate arrangements and heights of all developments and landscaping between the view areas and the water. In this regard, particular attention should be given to all waterfront locations, areas below vista points, and areas along roads that provide good views of the Bay for travelers...."

---

<sup>2</sup> <http://seachangesmc.com/>

Existing views to Belmont Slough, from the section of Oracle Parkway directly adjacent to the site, are limited due to the existing levee height, existing vegetation, the narrowness of the slough, and the distance from the road to the edge of the shoreline. Views across the slough are of residential homes. However, there are some views of Belmont Slough from Oracle Parkway to the east and west of the site.

With the proposed project, the limited views to the slough would be further impeded due to raising the majority of the levee by approximately 4 feet, additional raising of the site, and the school building itself. The site would be graded such that the finished floor elevation of the building would be 11 feet NAVD88. The majority of the building would be 31.5 feet tall (portions of the building are 38 feet tall), and the building would be approximately 426 feet long. Across the approximately 900-foot-long site, a total length of approximately 474 feet would be kept open along Oracle Parkway. In order to create more openness, the school building would be designed to allow an approximately 30-foot-wide view through the interior space in the center of the building by utilizing glass window paneling and careful interior design. Although there would be no public views to the slough from the road, the public would be able to view the slough from the Bay Trail, the plaza, seating areas, and other public access areas. The parking lot would be located away from the shoreline to minimize visual impacts on the shoreline.

*The Commission should determine whether the proposed project would maximize views to the Bay and shoreline.*

## B. Review Boards

1. **Engineering Criteria Review Board.** The Commission's Engineering Criteria Review Board did not review the proposed project because no Bay fill would be involved.
  2. **Design Review Board.** The Design Review Board (DRB) reviewed the proposed project on December 7, 2015. The DRB provided the project proponent with the following advice: (1) create views through the center for the building, and provide wider and more public access connections; (2) redesign the "Bay Trail Plaza" to make the space feel more public; (3) use a plant palette that considers the adjacent marsh; (4) improve the parking lot design to increase usability by the public and incorporate more trees; (5) define the schedule for public use of outdoor patios and parking lot; (6) consider the compatibility of public access areas with adjacent wildlife habitat; and (7) further evaluate the adaptation strategy to sea level rise.
- C. **Environmental Review.** Pursuant to the California Environmental Quality Act (CEQA), the City of Redwood City Planning Commission approved a final Environmental Impact Report (EIR) on May 3, 2016. The City evaluated the potential impacts of constructing the school and associated improvements, and adopted a Mitigation Monitoring and Reporting Program that requires implementation of mitigation measures that reduce impacts to "less than significant" levels.
- D. **Coastal Zone Management Act.** The Commission further finds, declares, and certifies that the activity or activities authorized herein are consistent with the Commission's Amended Management Program for San Francisco Bay, as approved by the Department of Commerce under the Federal Coastal Zone Management Act of 1972, as amended.

**E. Relevant Portions of the McAteer-Petris Act**

1. Section 66602
2. Section 66605
3. Section 66632

**F. Relevant Portions of the San Francisco Bay Plan**

1. *San Francisco Bay Plan* Policies on Public Access
2. *San Francisco Bay Plan* Policies on Appearance, Design and Scenic Views

**Exhibits**

- A. Existing Site Conditions**
- B. Existing and Proposed Public Access Areas**
- C. Proposed Public Access Improvements**
- D. Flooding and Sea Level Rise Cross Section**