



June 21, 2006

Hon John Seybert, Chairman
Members of the Planning Commission
Redwood City, California

Dear Chairman Seybert and Commissioners,

Cargill appreciates the opportunity to comment on the City's proposed Conservation Element and Open Space Element. We are suggesting corrections to a few statements that describe our properties within Redwood City: the 1,433 acre Industrial Saltworks at 295 Seaport Boulevard.

On page 2 of the Conservation Element, under the title *Mineral Resources* the second paragraph should be revised for accuracy. We suggest: "In the mid to late 1800s, following the Gold Rush, commercial salt production took hold on much of the property that adjoined South San Francisco Bay. Commercial salt production began in Redwood City in 1901 and has continued ever since. During World War II, the Leslie Salt Company, Cargill's predecessor, re-engineered and enlarged the Redwood City's Saltworks, expanding the operation to include salt ponds under what is now Redwood Shores and Bair Island and modernizing a 1,433-acre industrial harvest site at Seaport Boulevard. This new facility re-opened in 1951 and produced up to 350,000 tons of salt per year to serve the industrial markets in the Pacific Northwest, and the Pacific Rim. The Redwood Shores and Bair Island salt ponds were taken out of production in the 1960s when salt brines were brought over from the East Bay. With the exception of a few years, salt production at the Redwood City Industrial Saltworks has remained at or near the peak capacity, depending on weather conditions, from 1951 until 2005.

Please note: currently there are NO salt evaporation ponds in Redwood City, only industrial crystallizers. "Salt harvesting activities were downsized significantly during the last twenty years" is an inaccurate statement. With the exception of El Nino flooding in 1994 and some intermittent market downturns (1976, reopening in 1997; 1994, reopening in 1995), the annual salt harvests, which are weather-dependent, have met expectations.

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Finally, the last sentence: "As described in the Open Space Element, much of the land used for salt evaporation may eventually be restored to tidelands" is misleading as it tells only half the story. Of all the former salt evaporation ponds, approximately half are being restored under ownership of the U.S. Fish & Wildlife Service (Bair Island).⁷ Meanwhile, the other former salt evaporation ponds now accommodate the thriving residential and commercial area known as Redwood Shores.

On page 10 under the title *Protecting Habitat and Wildlife* there is some confusion created by the statement: "In the case of the Bayfront lands, efforts are underway to restore those areas that were former salt evaporation ponds."

Which former salt evaporation ponds are being discussed and who is making the effort to restore them? This should be clarified.

As the land owners of the Redwood City Industrial Saltworks, which has been described in various documents as falling within the City's "Bayfront" we can state categorically that we are making no efforts at this time to restore our salt crystallizers (previously mis-identified as salt evaporation ponds in this draft document) to tidal wetland. Although we are continuing to harvest the salts from these properties, this week we are notifying the City Council and residents that we intend to wind down these operations over the next few years. At the same time, we are launching a comprehensive community outreach program to elicit community priorities and suggestions for the future uses of this land.

Thank you for considering our comments which are intended to make the City's General Plan as accurate and up-to-date as possible.

Sincerely,



Paul Shepherd
Land Manager

PPS:djm