



September 6<sup>th</sup>, 2019

*Via Email*

Samantha Engelage, P.E.  
Senior Engineer, Environmental Services Division  
2501 Embarcadero Way | Palo Alto, CA 94303  
[Samantha.Engelage@CityofPaloAlto.org](mailto:Samantha.Engelage@CityofPaloAlto.org)

**RE: Palo Alto RWQCP Horizontal Levee Pilot Project**

Dear Samantha,

Thank you for the opportunity to comment on the plans for the Pilot Horizontal Levee in Palo Alto. Santa Clara Valley Audubon Society, Citizens Committee to Complete the Refuge and the Loma Prieta Chapter of the Sierra Club appreciate the effort to create habitat for native species while at the same time protect Palo Alto from sea level rise and provide other benefits.

The trail placement on the Bay side of the SAFER levee counteracts the proposed benefit to "Improve habitat along the perimeter of Harbor Marsh for native species." Proximity to public rails will reduce the habitat value of the Pilot Horizontal levee particularly for species most in need of it such as the endangered California Ridgway's rail and salt marsh harvest mouse. There is plenty of scientific evidence suggesting that activity and presence of people running, walking, recreating and dog-walking on bayside trails can particularly deter the more sensitive species from using and benefitting from high-tide refugia, upland-marsh service for marsh mammal migration and other habitat needs proposed for this horizontal levee. This comment was expressed when you presented the project to the Conservation Council and had the support of all the groups represented in the room at the time.

It is important to plan and execute Bay Shoreline Pilot Projects in ways that are both educational for the public and do not cause unintended harm to our fragile Bay fauna. This project, both forward-looking and experimental in nature, will stand as a model for subsequent implementations in methods and standards. Therefore we ask that the trail be constructed on the road side of the SAFER levee. Access to the top of that levee can be provided in one or two spots so people can see the project and learn about it while enjoying the views. At the same time, the project can have true ecological benefit for bird and mammal species at this marsh edge of the Bay.

If the proposed location of the trail is not modified, then we ask for full CEQA review to assess the potentially permanent harmful impacts of this project to wildlife, particularly endangered and threatened species.

Sincerely,

Shani Kleinhaus  
Environmental Advocate  
Santa Clara Valley Audubon  
Society

Eileen McLaughlin  
Board Member  
Citizens Committee to Complete  
the Refuge

Katja Irvin  
Conservation Co-Chair  
Sierra Club, Loma Prieta Chapter