



May 5, 2022

Rob Bartoli
Executive Officer
Local Agency Formation Commission
San Mateo County, California
Email submission only: rbartoli@smcgov.org

Dear Mr. Bartoli,

The Bay Alive Campaign of the Sierra Club Loma Prieta Chapter, the Citizens Committee to Complete the Refuge, and Green Foothills are grateful to have this opportunity to comment on LAFCo's Draft Municipal Service Report Update (MSR Update) regarding East Palo Alto Sanitary Services.

Our reading of the MSR Update found it to be thorough and very informative. Our organizations have invested substantial efforts monitoring and working with the planning process for East Palo Alto's Ravenswood Business District Specific Plan Update. As you may know, its CEQA Notice of Preparation is currently in its comment period. The MSR Update makes it clear we should recommend that the EIR thoroughly analyze sanitary and stormwater services.

We would like to bring a topic to your attention that was not considered in the MSR Update but has implications for all underground utilities in shoreline and lowland areas of East Palo Alto and similarly in other jurisdictions. The companion to sea level rise inundation is rising groundwater. It may cause underground pipes and conduits to fail.

We are attaching a letter that we recently sent to the East Palo Alto City Council that poses the issue of rising groundwater in more detail and provides references. We recommend that the City take certain actions to identify sites of particular risk due to rising groundwater. We encourage LAFCo to consider these same issues for all San Mateo County shoreline areas as appropriate.

Sincerely yours,



Eileen McLaughlin
Board Member
Citizens Committee to Complete the Refuge



Jennifer Chang Hetterly
Campaign Lead, Bay Alive
Sierra Club Loma Prieta Chapter



Alice Kaufman
Legislative Advocacy Director, Green Foothills

Additional attachment:

Ravenswood Business District Specific Plan Update Joint Letter dated 2/23/22