



June 15, 2022

Tess Byler, Senior Project Manager
San Francisquito Creek Joint Powers Authority
2100 Geng Road
Palo Alto, CA 94303
tbyler@sfcjpa.org

Dear Ms. Byler,

The Sierra Club's Loma Prieta Chapter and Bay Alive Campaign respectfully submit the following comments on the Notice of Preparation for the San Francisquito Creek Joint Powers Authority's (SVCJPA) Environmental Impact Report for the project titled *Strategy to Advance Flood Protection, Ecosystems and Recreation along San Francisco (SAFER) Bay*.

Our chapter has a deep interest in the San Francisco Bay and its ecosystems, as well as areas near the Bay where development may impact natural resources and climate resilience in the region. We recognize and support the importance of the SAFER Bay Project in providing flood protection for communities near the Bay as sea levels rise. However, we have concerns about some aspects of the proposed project that we hope to see addressed in the Draft Environmental Impact Report (DEIR). We also wish to reinforce and support the comments submitted by the South Bay Salt Pond Restoration Project on June 3, 2022 (attached). Our comments are listed below.

General Comments

Construction of a new levee with a 60-100 foot base including placement of a floodwall, increasing ground elevation to 16-17 feet (NAVD 88) and addition of minimum 3:1 (horizontal:vertical) slopes requires significant fill and, as a result, reduces wetland habitat throughout the area and negatively impacts wildlife. We acknowledge that this may be necessary in some areas to achieve the goals of the project. However, wherever possible, new levees should be located upland of existing wetlands, on land, to minimize Bay fill and the associated loss of wetland habitat and impact on wildlife. This is consistent with East Palo Alto's Ravenswood Business District Specific Plan Policy LU-9.4 that says in part:

“Rights-of-way for levees or other structures protecting inland areas from tidal flooding should be sufficiently wide on the upland side to allow for future levee widening to support additional levee height so that no fill for levee widening is placed in the Bay.”

The SAFER project plans show ponds as they exist today and do not reflect the future plans for ponds in the Don Edwards San Francisco Bay National Wildlife Refuge as described in South Bay Salt Pond Restoration Project’s multi-phase implementation plan. Existing plans for future pond operation in the Refuge must be reflected in the environmental impact analysis for the project. Similarly, we would like to see the DEIR include Meta’s Willow Village project and East Palo Alto’s Ravenswood Business District Specific Plan Update in a cumulative impact analysis.

Specific Comments

First, we urge you to drop construction of a roadway for vehicle traffic between SF2 ponds in the Don Edwards San Francisco Bay National Wildlife Refuge from the project alternatives to be considered in the DEIR. Use of the refuge as a roadway is in direct conflict with the purpose of the refuge which is to preserve and enhance wildlife habitat. A roadway would have a significant negative impact on wildlife using the SF2 ponds, both during construction and under normal use. It would also require additional Bay fill to be used between the SF2 ponds, resulting in a permanent loss of habitat potential.

We are similarly concerned about the extension of that roadway into East Palo Alto. In our May 16, 2022 scoping letter regarding East Palo Alto’s Ravenswood Business District Specific Plan Update (attached), we expressed significant concern about encroachment from new development and associated infrastructure constraining width and alignment options for the SAFER Levee and reducing flexibility for future heightening of the levee. We maintain that the best and highest use of the lands proposed for the Loop Road in East Palo Alto is a flood protection levee that can be raised over time to protect the University Village area.

Second, we are concerned about the location of the segment of the SAFER Levee between Ravenswood Slough and Hacker Way. The new higher levee should be located inland of the Ravenswood Slough toward Hacker Way. It is critical to site this new higher levee upland of the Ravenswood Slough toward Meta Headquarters parking area to minimize the loss of habitat and the impacts on wildlife.

Third, we are concerned about the plans for the North of Bay Road segment of the SAFER Levee in that it includes only a floodwall, inboard of the Bay Trail, and no obvious plans to raise or relocate the Bay Trail. A new higher levee and Bay Trail should be constructed upland of wetlands on land similar to plans for the SAFER Levee segment South of Bay Road. Plans to assure the continued viability of this section of the Bay Trail should not be delayed as a future continuous Bay Trail should be a goal of the project.

Finally, we are concerned about construction impacts on sensitive Bay ecosystems in the project area. We recommend a baseline Biological Resource Assessment (BRA) be performed as part of the environmental analysis for this project and established as a standard methodology

for subsequent project level environmental review. BRAs should be undertaken for each reach and bio-niches within the reach. Please see page 4 of the attached May 16 Joint Scoping Letter to the City of East Palo Alto for a recommended BRA approach.

We appreciate the opportunity to participate in this project's development and request that you include alternatives in your environmental impact report that include no roadway between SF2 ponds, location of the SAFER levee segment north of Bay Road in East Palo Alto upland of any marshland and location of the SAFER levee segment around Meta Headquarters completely upland of the Ravenswood Slough.

Respectfully,



Susan DesJardin
Bay Alive Chair
Sierra Club Loma Prieta Chapter



Jennifer Chang Hetterly
Bay Alive Coordinator
Sierra Club Loma Prieta Chapter

Attachments:

- South Bay Salt Pond Restoration Project Comment letter, dated June 3, 2022
- Joint Scoping Comments to the City of East Palo Alto regarding the Ravenswood Business District Specific Plan Update, dated May 16, 2022