



September 28, 2022

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United States Army Corps of Engineers
450 Golden Gate Avenue, 4th Floor
San Francisco, CA 94102-3404
Submitted by Email: Frances.P.Malamud-Roam@usace.army.mil

RE: SPN-2018-00371 - West Bay Sanitary District Flow Equalization and Resource Recovery Facility Protection Project

Dear Ms. Malamud-Roam,

The Friends of Bedwell Bayfront Park, Santa Clara Valley Audubon Society, Sequoia Audubon Society, Sierra Club Loma Prieta Chapter and the Sierra Club Bay Alive Campaign take this opportunity to respond to the Public Notice regarding the West Bay Sanitary District Flow Equalization and Resource Recovery Facility Protection Project.

Having reviewed the revised information published on August 19, 2022, we find it necessary to reiterate our concerns expressed in our letter to you dated March 14, 2022 ([linked here](#)).

We are generally supportive of using ecotone levees as nature-based adaptation strategies where appropriate. However, the revised design still places the ecotone levee on slough wetlands. While improved, the design still fails to fulfill the transitional ecotone levee function of expanding habitat area upslope and inland, providing for future habitat migration as the seas rise. As proposed, there will still be temporary and permanent damage to existing sensitive wetlands.

1. The location, elevation and slope of the proposed ecotone levee

The project proposes to build the ecotone levee outside the WBSD property and within a waterway. This encroachment into the slough may prove detrimental to habitat and channel flow. Placing the proposed ecotone slope of the levee fully on slough wetlands negates the beneficial adaptive impacts of an ecologically effective horizontal levee. We believe that the WBSD must use its lands and shift the ecotone inland to avoid the near-term loss of tidal plain. In addition, an "ecotone" levee generally requires a gentler slope, to create a true transitional levee on which tidal habitats could migrate upwards as the seas rise.

Alternative analysis is needed to determine how the ecotone levee can be located entirely on WBSD land. Additional analysis of impacts to habitat and channel flow evaluations are needed prior to adopting the proposed design approach. The potential for increased erosion of the banks at Greco island, and potential inundation and erosion of tidal marsh through redirected tidal flow should be evaluated.

2. Oyster reef

More information is needed, including specifics on how the location is suited to establish oyster habitat, and how this structure will affect stream dynamics or sediment deposition relative to sea level rise and/or impacts to slough or Greco Island habitat. Please analyze these concerns.

3. Helicopter pad

More information is needed on the proposed use and frequency. We are concerned that the noise, wind, and lighting associated with this use at this area, which is immediately adjacent to sensitive wildlife areas, is inappropriate. The site is very close to both Palo Alto and San Carlos airports which would seem to offer better and existing landing sites.

We appreciate having this opportunity to comment, and hope that our comments can be used to create a project that minimizes or avoids environmental wetland impact and instead provides long-term ecological benefit. This Bay location is, and has long been, healthy habitat for wildlife including multiple endangered species.

Sincerely,
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