

DRAFT COMMENT LETTER

August _____, 2024

San Francisquito Creek Joint Powers Authority
Attn: Margaret Bruce, Executive Director
750 Menlo Park, Suite 250
Menlo Park, CA 94025

Submitted via email: mbruce@sfcjpa.org

Re: SAFER Bay Project

Dear Ms. Bruce,

On behalf of the Midpeninsula Regional Open Space District (Midpen) Board of Directors (Board), we appreciate you and San Francisquito Creek Joint Powers Authority (SFCJPA) staff attending our August 14, 2024 Board meeting and presenting an overview of the SAFER Bay Project and its relationship to our Ravenswood Open Space Preserve (Preserve) and the San Francisco Bay Trail. As you are aware, our Preserve protects natural ecosystems and sensitive tidal marsh habitat and offers public recreational trails and open space community benefits for residents in the neighboring cities of East Palo Alto, Menlo Park and Palo Alto.

First and foremost, from a policy standpoint, our Board acknowledges the multi-benefits of the SAFER Bay Project in protecting critical infrastructure, providing community resilience to tidal flooding and projected sea level rise, restoring habitat for Western Snowy Plover, and improving public recreational access to the shoreline area. At the same time, we would also like to emphasize the significant public investments that the District has made in public access, interpretive elements and habitat improvements within the Preserve that may be affected by the proposed SAFER Bay Project. Therefore, the Board strongly urges the SFCJPA to minimize the SAFER Bay Project impacts to the existing public recreation infrastructure and to critical bay habitats.

The biggest potential impact to the Preserve's sensitive tidal salt marsh habitats is dependent on the selected levee alignment. The Midpen Board's strong preference is for the interior levee alignment north of Bay Road to the Dumbarton rail corridor – in contrast, the Midpen Board strongly urges against pursuing the outboard levee alignment alternative that would traverse greater stretches of tidal marsh and more severely impact existing public access facilities and sensitive habitat. Although a portion of the interior levee alignment would need to be built on the Preserve, this preferred alignment would best maintain the integrity of a more connected marsh, with tidal flows that protect the natural functions of the existing tidal marsh and Baylands ecosystem.

Moreover, the internal levee also best aligns with the City of East Palo Alto's Ravenswood Business District Specific Plan Update. The internal levee alignment maintains continuity of public access and the public's experience to the natural ebbs and flows of our iconic bay, thus avoiding disrupting this experience by changing the ecology of the area with the creation of an unnatural water retention basin. The alternate levee alignment on the existing Bay Trail levee would cut off tidal flow to existing marsh, impacting and converting crucial tidal salt marsh habitat and threatening the survival of two tidal marsh-dependent endangered species: the saltmarsh harvest mouse and Ridgeways rail.

As part of the SAFER project design process, we would like SFCJPA to consider, preserve and/or incorporate the following critical features to best protect and preserve as much of the existing public access infrastructure and avoid impacts to public access and to the Baylands experience:

- The Bay Trail along the existing levee;

- The Bay Trail boardwalk, bridge, rest areas and interpretive signage;
- Recreational and vehicle access from Bay Road to the preserve and Cooley Landing;
- Recreational and vehicle access across Bay Road; and
- Recreational access to the spurs of the Bay Trail leading to observation decks within the Preserve.

Moreover, the Preserve’s natural resources that need to be protected as part of the SAFER Bay Project include:

- The marsh/slough that exists between the existing Bay Trail levee and the interior alignment SAFER levee;
- The marsh on the bay side of the Bay Trail levee; and
- The slough between Bay Road and the existing levee trail.

Additionally, we extend our support for:

- SFCJPA’s goals for continued public access to the bay by providing an ADA-compliant connection between the proposed new levee and existing public access facilities to ensure that the existing Preserve boardwalk and ramps are incorporated as part of the SAFER Bay project.
- Additional restoration activities to ensure the marsh between the Bay Trail levee and the SAFER Bay levee does not dry out by creating openings for tidal water flow through the existing Bay Trail levee and providing a transitional vegetation zone on the SAFER levee and other high tide refugia.
- Exploring the possibility of allowing public access on the SAFER Bay levee from the Preserve to connect to the existing public access trail that runs between Pond SF2 (U1) and the northern section of the Preserve and ends at the Highway 84 frontage road.
- Exploration of long-term solutions with the City of East Palo Alto to raise Bay Road as part of future capital improvements to improve flood protection.

The Board appreciates SFCJPA staff’s commitment to continually coordinate with the District on this project, where District staff can review and advise on the 10% plans and subsequent designs for the flood protection levees north of Bay Road. As part of ongoing communications with the District, SFCJPA’s proposed timeline for breaching the Bay Trail Levee will facilitate early coordination between the agencies to ensure continued public access during project implementation.

Finally, our Board understands the need for and supports the creation of a new shoreline levee, which will provide much needed flood protection for City of East Palo Alto residents and surrounding communities. As the District continues to deliver our mission-driven work through ongoing management of Ravenswood Open Space Preserve and the incredible opportunities that this land provides for community access to nature close to many homes, we remain committed in working closely with the SFCJPA to meet our shared goals for climate resiliency, ecosystem protection, and outdoor recreation.

Sincerely,

Margaret MacNiven, Board President
Midpen Board of Directors

CC: Ana Ruiz, General Manager
Brian Malone, Assistant General Manager, Visitor and Field Services
Midpen Board of Directors