



## CITY OF MOUNTAIN VIEW

Office of the Mayor and City Council • 500 Castro Street • Post Office Box 7540 • Mountain View, California 94039-7540  
650-903-6305 • FAX 650-903-6039

May 18, 2016

Ms. Brenda Buxton – Project Manager  
California State Coastal Conservancy  
1330 Broadway, 13th Floor  
Oakland, CA 94612

Dear Ms. Buxton:

This letter transmits the City's comments to the South Bay Salt Pond Restoration Project – Phase 2, Final Environmental Impact Statement/Report, based on Council action on May 17, 2016.

Please find the following City's comments to the South Bay Salt Pond Restoration Project – Phase 2, Final Environmental Impact Statement/Report, which was approved for transmittal by the City Council.

1. The City supports the project to proceed with the preferred alternative (modified Alternative B) as described in the Final Environmental Impact Statement/Report. The City will collaborate with the U.S. Fish and Wildlife Services and the California State Coastal Conservancy on project design and construction coordination.
2. The Santa Clara Valley Water District commented that the design elevation to address the anticipated sea level rise should be set at 14.7' NAVD (North American Vertical Datum of 1988). The City's current design elevation is 14' NAVD, with provisions that levee foundations be built for possible future levee elevation rise to 16' NAVD. While the City is open to discuss the proposed levee height to be in-line with the regional planning efforts, the City is not currently committed to build levees to elevation 14.7' NAVD as discussed in the EIS/EIR.
3. The City commented in the Draft EIS/EIR under L-CMV-5, North Shoreline Boulevard is not a feasible construction route due to heavy traffic. An alternate route will be needed for access to Pond A2W.
4. *Page ES-43 of the Executive Summary, Table ES-4 Impact 3.5-25: Potential construction-related loss of, or disturbance to nesting raptors (including burrowing owls).* It stated Mountain View Alternative B will have Less Than Significant Impact to burrowing owls during construction. However, the access route shown in Appendix G, Figure 2-2, shows the route going through E-Lot and along the west side of the Mitigation channel in the NE Meadowlands. During the first quarter of 2016, the City observed four burrowing owls using burrows in E-Lot, including one nesting pair. Along the slope to the west of the Mitigation channel in the NE Meadowlands, the City observed four active burrows with

Ms. Brenda Buxton

May 18, 2016

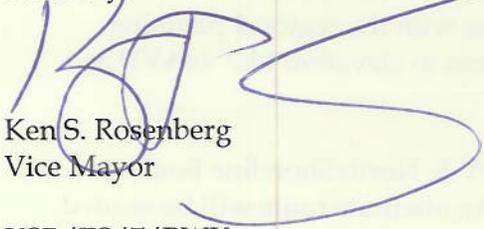
Page 2

two to three burrowing owls, with three of these burrows being only 10' from the existing trail. Construction traffic will have major impacts to burrowing owls' mortality rates. They only fly 2' to 3' above the ground when flushed due to disturbance or when foraging; thus, they would collide with vehicles. The proposed access route would be inside the recommended CDFW burrows buffer zone. Considering the 2016 observations plus the historical regular burrowing owl use over the past 18 years at E-Lot and the NE Meadowlands, the project needs to be flexible in considering access routes in order to accommodate burrowing owls.

5. *Page 5 of Appendix M, third bullet point, Special-status species.* This section does not make reference to the Ridgway's Rail (formerly the California clapper rail), a Federally Endangered Species. Several other sections of the document fail to include the Ridgway's Rail, and only mentioning some other species. A 2015 report ([http://www.spartina.org/documents/RIRA\\_Report\\_2015\\_FINAL\(sm\).pdf](http://www.spartina.org/documents/RIRA_Report_2015_FINAL(sm).pdf)) for the State Coastal Conservancy Spartina Project states that the density of Ridgway's Rail in parts of Shoreline at Mountain View near Charleston Slough and Permanente Creek is a medium-density site for this Endangered Species and, as such, requires a no take of this species.
6. *Page 6-10, Chapter 6, Table 6-2. Comparison of Alternatives at the Alviso-Mountain View Ponds.* It stated that three to five bird habitat islands will be installed in each of the two ponds, but it depends on soil availability. If soil availability were limited, what is the decision process on the number of bird habitat islands at each pond? Does one pond provide greater biological opportunity than the other?

The City appreciates the opportunity to respond to the Final Environmental Impact Statement/Report and commends the work of the U.S. Fish and Wildlife Services and the California State Coastal Conservancy.

Sincerely,



Ken S. Rosenberg  
Vice Mayor

KSR/TS/7/PWK  
001-05-18-16L-E

**RECEIVED**  
MAY 23 2016  
COASTAL CONSERVANCY  
OAKLAND, CALIF.



May 13, 2016

Ms. Patricia Maurice  
District Branch Chief – Local Development  
California Department of Transportation District 4  
P.O. Box 23660  
Oakland CA 94623-0660

Dear Ms. Maurice:

My apologies for omitting the Department of Transportation comment letter from the the *Final Environmental Impact Statement/Report, Phase 2 -- South Bay Salt Pond Restoration Project, April 2016* (Final Phase 2 EIS/R). I did receive your comment letter within the formal comment period, but as it was sent directly to me, not to the address designated for formal submissions, this led an inadvertent omission from the responses to comments presented in the Final Phase 2 EIS/R. Attached please find your original letter with numbered comments and the South Bay Salt Pond (SBSP) Restoration Project's responses to your comments.

Please note that the May 26, 2016 Staff Recommendation to the Conservancy's Board to certify the EIS/R and fund Phase 2 actions will include your letter and the responses. The SBSP Restoration Project views the Department of Transportation as an important project partner and will continue to collaborate and coordinate with the Department to develop the required plans and obtain the approvals and permits described in this comment letter.

Sincerely,

A handwritten signature in blue ink that reads "Brenda Buxton".

Brenda Buxton  
Deputy Bay Program Manager  
State Coastal Conservancy

1330 Broadway, 13th Floor  
Oakland, California 94612-2512  
510-286-1015 Fax: 510-286-0470



**DEPARTMENT OF TRANSPORTATION**

DISTRICT 4

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OAKLAND, CA 94623-0660

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*Serious Drought.  
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September 8, 2015

BAG061

SCH# 2013092010

Ms. Brenda Buxton  
California Coastal Conservancy  
1330 Broadway, 13<sup>th</sup> Floor  
Oakland, CA 94612

Dear Ms. Buxton:

**South Bay Salt Pond Restoration Project, Phase 2 – Draft Environmental Impact Report (DEIR)**

**S-CDT-1**

Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. We have reviewed the DEIR and have the following comments. Please also refer to our previous comment letter, dated October 7, 2013, on the Notice of Preparation for this project. Additional comments may be forthcoming.

**S-CDT-2**

***Project Understanding***

The proposed project locations are in Alameda, Santa Clara, and San Mateo Counties adjacent or in close proximity to State Route (SR) 84, SR 237, U.S. 101, and Interstate (I-) 880. The project is to restore tidal marsh habitat, reconfigure managed pond habitat, maintain or improve flood protection, and provide recreation opportunities and public access in 15,100 acres of former salt-evaporation ponds.

**S-CDT-3**

***Lead Agency***

As the lead agency, the California Conservation Conservancy (CCC) is responsible for all project mitigation, including any needed improvements to State highways. The project's financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

**S-CDT-4**

***Transportation Management Plan***

A Transportation Management Plan (TMP) or construction Traffic Impact Study, including staging areas, may be required for approval by Caltrans prior to construction. Specifically, potential impacts to State facilities from this large excavation conveyance of native material should be analyzed in detail. TMPs must be prepared in accordance with California *Manual on*

Ms. Brenda Buxton/California Conservation Conservancy

September 8, 2015

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**S-CDT-4  
cont.**

*Uniform Traffic Control Devices.* Further information is available for download at the following web address: <http://www.dot.ca.gov/hq/traffops/signtech/mutcdsupp/pdf/camutcd2012/Part6.pdf>.

Please ensure that such plans are also prepared in accordance with the transportation management plan requirements of the corresponding jurisdictions. For further TMP assistance, please contact the Office of Traffic Management Plans at (510) 286-4647.

**S-CDT-5**

***Transportation Permit***

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, a completed transportation permit application with the determined specific route(s) for the shipper to follow from origin to destination must be submitted to: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. See the following website for more information: <http://www.dot.ca.gov/hq/traffops/permits>.

**S-CDT-6**

***Hydrology & Design***

To ensure State facilities in the adjacent vicinities remain free of flooding, any further hydrological and geological studies, continued monitoring of the development in this area, the maintenance of current levees, and construction of new levees should be conducted in coordination with Caltrans District 4.

**S-CDT-7**

***Geology, Soils, and Seismicity***

Although all four locations of the project ponds are classified as having violent ground shaking potential, the DEIR did not discuss the impact of this seismic hazard in each location. Also, Caltrans recommends the Cascade Fault be included in the analysis. It is an active fault located 4.46 miles southwest of the Alviso Mountain View Ponds.

**S-CDT-8**

***Encroachment Permit***

Please be advised that any work or traffic control that encroaches onto the State ROW requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating State ROW must be submitted to: David Salladay, District Office Chief, Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans prior to the encroachment permit process. See this website for more information: <http://www.dot.ca.gov/hq/traffops/developserv/permits>.

Ms. Brenda Buxton/California Conservation Conservancy

September 8, 2015

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Should you have any questions regarding this letter, please contact Brian Ashurst at (510) 286-5505 or [brian.ashurst@dot.ca.gov](mailto:brian.ashurst@dot.ca.gov).

Sincerely,



*for* PATRICIA MAURICE  
District Branch Chief  
Local Development - Intergovernmental Review

c: Scott Morgan, State Clearinghouse

**California Department of Transportation (Caltrans; CDT) (8 comments)**

**S-CDT-1**

This comment was about the mission of the California Department of Transportation (Caltrans), its review of the project, and its submission of comments at the scoping phase of the project. The SBSP Restoration Project appreciates Caltrans' reviews and comments on project documents.

**S-CDT-2**

This comment describes Caltrans understanding of the SBSP Restoration Project, which is accurate.

**S-CDT-3**

This comment describes the California State Coastal Conservancy's responsibilities, as the State Lead Agency under CEQA, to provide necessary mitigation as well as monitoring and funding for it. The Conservancy acknowledges these responsibilities.

**S-CDT-4**

This comment describes the possibility that a Transportation Management Plan and/or Traffic Impact Study for construction access, staging areas, and other aspects of the project may be necessary. It also provides guidance on how those plans should be developed and how assistance from Caltrans can be obtained. The SBSP Restoration Project appreciates this information and will seek assistance and collaboration with Caltrans as the project develops.

**S-CDT-5**

This comment notes that oversized or excessive loads on State roadways require transportation permits from Caltrans. The SBSP Restoration Project acknowledges this and will seek to obtain those permits at the appropriate time. The Project appreciates the guidance provided in this comment on how Caltrans assistance in this process can be obtained.

**S-CDT-6**

This comment notes that Caltrans should be involved in the design and construction of project activities that could affect State roadways or other facilities. The SBSP Restoration Project acknowledges this and will undertake that coordination at the appropriate time.

**S-CDT-7**

This comment notes that violent ground shaking is a possibility at all Phase 2 project locations that was not explicitly included in the EIS/R's analysis. It also notes that the Cascade Fault, an active fault some 4.5 miles from one of the Phase 2 pond clusters, should be included in the design and planning. The purpose of an EIS/R is to assess the project's potential effects on the environment, not the environment's potential effect on the project. The SBSP Restoration Project recognizes that there is potential for violent ground shaking and other seismic activity, and the designs and planning for project components do include this potential and address it as needed. In addition, the impacts described and assessed in Section

## Exhibit 7: Comments

4.4, Geology and Soils, evaluate the extent to which on-site adverse interactions between the project components and geologic hazards such as settlement/subsidence, fault rupture, liquefaction, etc. are possible. That section found that the Phase 2 project actions would not increase the likelihood or magnitude of these hazards or increase the risk or vulnerability of people or structures to them.

### **S-CDT-8**

This comment notes that encroachment permits must be obtained from Caltrans for any work or traffic control that encroaches onto State roadways or rights-of-way. The SBSP Restoration Project acknowledges this and will seek to obtain those permits at the appropriate time. The Project appreciates the guidance provided in this comment on how Caltrans assistance in this process can be obtained.



May 13, 2016

Ms. Azalea A. Mitch  
Senior Civil Engineer  
City of Menlo Park  
701 Laurel Street  
Menlo Park, CA 94025

Dear Ms. Mitch:

My apologies for omitting the City of Menlo Park's comment letter from the *Final Environmental Impact Statement/Report, Phase 2 -- South Bay Salt Pond Restoration Project, April 2016* (Final Phase 2 EIS/R). I did receive your comment letter within the formal comment period, but as it was sent directly to me, not to the address designated for formal submissions, this led an inadvertent omission from the responses to comments presented in the Final Phase 2 EIS/R. Attached please find your original letter with numbered comments and the South Bay Salt Pond (SBSP) Restoration Project's responses to your comments.

Fortunately, the substantive issues of many of these comments were already addressed in the Final EIS/R, and others are being addressed in the more details design work that is underway now. The City will be provided draft versions of those updated and more detailed designs for its review prior to their completion. Further, the May 26, 2016 Staff Recommendation to the Conservancy's Board to certify the EIS/R and fund Phase 2 actions will include your letter and the responses.

The SBSP Restoration Project views the City of Menlo Park as an important project partner and will continue actively working with the City throughout the planning and design processes.

Sincerely,

A handwritten signature in blue ink that reads "Brenda Buxton".

Brenda Buxton  
Deputy Bay Program Manager  
State Coastal Conservancy

1330 Broadway, 13th Floor  
Oakland, California 94612-2512  
510-286-1015 Fax: 510-286-0470





October 29, 2015

Brenda Buxton, Project Manager  
 State Coastal Conservancy  
 1330 Broadway, 13<sup>th</sup> Floor  
 Oakland, CA 94612  
 (sent via email to: [brenda.buxton@scc.ca.gov](mailto:brenda.buxton@scc.ca.gov))

**RE: Review of Draft Environmental Impact Statement Report, Phase 2 of the South Bay Salt Pond Restoration Project – Ravenswood Ponds**

Dear Ms. Buxton:

Included below are the City of Menlo Park’s (City) comments on the Draft Environmental Impact Statement Report (DEIS/R), Phase 2 of the South Bay Salt Pond Restoration Project. In summary, City staff believes that further information is required to determine the flood protection impacts associated with the restoration alternatives proposed in the DEIS/R. Specifically, the City has the following comments:

**L-CMP-1**

- Flood control: The DEIS/R states that the improvements associated with the Ravenswood Alternatives B, C, and D will either meet or exceed the current level of flood protection. An explanation of the current level of flood protection needs to be defined in the DEIS/R. In Appendix O Ravenswood Ponds R3, R4, R5, and S5 Restoration Preliminary Design, the report notes that introducing tidal action to Pond R4 will require additional flood protection, but that some of the locations (e.g. Highway 84) are “logistically impossible” (see comments Nos. 30 and 35 in the section below). The findings presented in the preliminary design report contradict the benefit analysis presented in the main text of the DEIS/R. Further clarification is required regarding the constraints associated with the additional flood protection measures that would be required as part of the restoration alternatives. The City cannot support measures that would negatively impact flood protection.

**L-CMP-2**

- Ravenswood Alternative D: This option would allow Ponds R5/S5 to receive storm flow from the Cities of Redwood City, Menlo Park, Atherton, Woodside, and the County of San Mateo. The City believes that this is the only option that would provide local flood relief and it is the preferred alternative.

**L-CMP-3**

- Sea Level Rise: The DEIS/R notes that the levee improvements along the All-American Canal will prevent tidal overtopping and preclude flooding caused by sea level rise (see comment No. 21). It is unclear how the proposed improvements account for sea level rise. We recommend that the levee height be increased from the proposed 9.0 feet North American Vertical Datum 1988 (NAVD 88) to an elevation of 11.0 feet NAVD 88. The elevation of 11.0 feet would provide one foot of additional protection above the 10.0 feet NAVD 88

**L-CMP-4**

FEMA’s ZONE AE/100 year food elevation.<sup>1</sup> In addition, we recommend that

Exhibit 7: Comments

**L-CMP-4  
cont.**

that the levees be widened to allow for future additional height modifications and adaptive management strategies.

**L-CMP-5**

- Public Access: The City’s preferred Alternative D would provide local flood relief as well as improved public access through the proposed trails and connection to the Bay Trail.

**L-CMP-6**

Questions and Comments specific to the DESI/R:

1. Figure ES-12: Please correct the title on the figure.

**L-CMP-7**

2. p. ES-28 Alternative B: This paragraph notes that Alternative B “would open Pond R4 to tidal flows, improve levees to provide additional flood protection” – clarification on the additional flood protection is required. Please note Comment No. 30 regarding the improvements that would be needed to provide the additional flood protection based on the preliminary engineering design report included as part of Appendix O. The main body of the DESI/R does not make reference to the constraints noted in Appendix O.

**L-CMP-8**

3. p. ES-28 Alternative D: This alternative would allow stormwater outflow from the Cities of Redwood City, Menlo Park, Atherton, Woodside, and the County of San Mateo, not just from Redwood City.

**L-CMP-9**

4. p. ES-29 Operation and Maintenance, second paragraph: Is the plan to certify the levees to provide FEMA 100 year flood protection? If so, the proposed levee improvements must be consistent with the 100 year event elevation. The Ravenswood Ponds R3, R4, R5, and S5 Restoration Preliminary Design report included as Appendix O does not propose improved levee heights that would provide protection from the 100 year event.

**L-CMP-10**

5. p. ES-29 Operation and Maintenance, third paragraph: The stormwater connection to Ponds R5/S5 will involve a multi-jurisdictional effort which will involve the Cities of Redwood City, Menlo Park, Atherton, Woodside, and the County of San Mateo County, not just Redwood City.

**L-CMP-11**

6. p. ES-30 Alternative Ravenswood D, first paragraph: Stormwater runoff will be from the Cities of Redwood City, Menlo Park, Atherton, Woodside, and the County of San Mateo.

**L-CMP-12**

7. p. ES-34 Table ES-4: The table indicates that only Ravenswood Alternative D provides a benefit with respect to an increased risk of flooding, meaning the flood risk would be reduced. All the other alternatives have a less than significant impact. Flood protection is therefore only provided by Alternative D. The text in the Alternative descriptions should be modified to reflect this impact. However, please note comment No. 30.

**L-CMP-13**

8. P. 2-47 Alternatives and Figures: The existing levee elevations need to be included in the descriptions and figures.

**L-CMP-14**

9. p. 2-47 Alternative Ravenswood B: The report notes that this alternative will provide additional flood protection. This benefit requires further explanation. How will the alternative provide flood protection and to what extent? Please note comment No. 30.

**L-CMP-15**

10. p. 2-47 Alternative Ravenswood B: Please include the existing elevation of the levee on the eastern side of Pond 4.

**L-CMP-16**

11. p. 2-50 Alternative Ravenswood B: Please include the existing elevation of the levee along the All American Canal.

Exhibit 7: Comments

- |                 |  |
|-----------------|--|
| <b>L-CMP-17</b> | 12. p. 2-54 Complete Ponds R5 and S5 loop trail: The City is in support of increased connectivity to the Bay Trail.  |
| <b>L-CMP-18</b> | 13. p. 2-55 Alternative D: The stormwater outflow will be from the Cities of Redwood City, Menlo Park, Atherton, Woodside, and the County of San Mateo, not just Redwood City.   |
| <b>L-CMP-19</b> | 14. p. 2-55 Alternative D: The second bullet item notes that the levees around the All American Channel will be raised to maintain current levels of flood protection. How does this elevation relate to that of the levee located on the eastern side of pond R4? This statement contradicts the statement included in the first paragraph, which notes additional flood protection.  |
| <b>L-CMP-20</b> | 15. p. 2-60 Construction Access: The City will require the development of a traffic control plan for review and approval.  |
| <b>L-CMP-21</b> | 16. p. 2-60 Construction Staging Areas: Coordination with the City and other appropriate agencies will be needed regarding the staging areas required for the project.   |
| <b>L-CMP-22</b> | 17. p. 2-69 Operations and Maintenance: The second paragraph describes a scenario where the levees could provide FEMA 100 year protection. Further clarification is required on which levees would provide this level of protection. The Ravenswood Ponds R3, R4, R5, and S5 Restoration Preliminary Design report included as Appendix O does not propose improved levee heights that would provide protection from the 100 year event.   |
| <b>L-CMP-23</b> | 18. p. 3.2-27 Hydrology Ravenswood Alternatives B, C, and D: The report notes that the levee along Pond R4 / All-American Canal would be raised to maintain or exceed the current level of flood protection. Is the intent to obtain FEMA certification for the raised levee? Does the hydraulic modeling verify this statement? The Ravenswood Ponds R3, R4, R5, and S5 Restoration Preliminary Design report included as Appendix O does not propose improved levee heights that would provide protection from the 100 year event. Additionally, the design report notes that improvements would have to be made to the levees along Highway 84 to provide flood protection (see comment No. 30). While the report notes that adaptive management will be used to verify the flood protection findings, what measures will be implemented if the restoration effort results in decreased flood protection? |
| <b>L-CMP-24</b> | 19. p. 3.2-28 Hydrology Ravenswood Alternative D: The City supports Alternative D, as it is the only option that provides local flood relief.  |
| <b>L-CMP-25</b> | 20. p. 3.3-33 Water Quality, Alternatives B, C, and D: As part of these alternatives, Ponds R5 and S5 would become managed ponds. If these ponds are poorly managed, the water will have a higher likelihood to exhibiting algal abundance. Adaptive management efforts, such as modifying the hydraulics or modifying the depth, will be implemented. What monitoring effort will be implemented to prevent algal blooms in these ponds? Which agency / party will be responsible for managing the ponds?   |
| <b>L-CMP-26</b> | 21. p. 3.4-17 Geology, Soils, and Seismicity Alternatives B, C, and D: This section notes that the levee improvements along the All-American Canal will prevent tidal overtopping and preclude flooding caused by sea level rise. Does the hydraulic modeling developed to evaluate these options verify these findings?   |
| <b>L-CMP-27</b> | 22. p. 3.4-26 Alternative D: The Bayfront Canal receives storm flow from the cities of Redwood City, Menlo Park, Atherton, and Woodside (not just from Redwood City)   |

<b>L-CMP-27 cont.</b>	and from San Mateo County. The project to connect the Bayfront Canal to Pond S5 would involve a multi-jurisdictional effort.
<b>L-CMP-28</b>	23. p. 3.5-49 Alternative D: The report notes that the conversion of Ponds R5/S5 to managed ponds receiving storm flow would not have a significant impact on shorebirds. This option has the added benefit of providing local flood relief, while not adversely impacting the biological resources. The City prefers this option.
<b>L-CMP-29</b>	24. p. 3.5-77 Alternative D: The Bayfront Canal receives storm flow from the cities of Redwood City, Menlo Park, Atherton, and Woodside (not just from Redwood City) and San Mateo County. The project to connect the Bayfront Canal to Pond S5 would involve a multi-jurisdictional effort.
<b>L-CMP-30</b>	25. p. 3.5-82 Alternative D: The Bayfront Canal receives storm flow from the cities of Redwood City, Menlo Park, Atherton, and Woodside (not just from Redwood City) and San Mateo County. The project to connect the Bayfront Canal to Pond S5 would involve a multi-jurisdictional effort.
<b>L-CMP-31</b>	26. pp. 3.6-12 and 13 Alternatives C and D: Both of these options have the added benefit of public access, which the City supports.
<b>L-CMP-32</b>	27. p. 3.8-2 Alternative D: As the Bayfront Canal receives storm flow from the cities of Redwood City, Menlo Park, Atherton, and Woodside (not just from Redwood City) and the County of San Mateo, the project to connect the Bayfront Canal to Pond S5 would involve a multi-jurisdictional effort.
<b>L-CMP-33</b>	28. p. 3.11-21 Alternatives B, C, and D: Construction activities associated with these options will impact access to the Bedwell-Bayfront Park (Park). The activities shall be coordinated with the City in an effort to minimize the impact to the Park and to maintain accessibility.
<b>L-CMP-34</b>	29. Appendix O Ravenswood Ponds R3, R4, R5, and S5 Restoration Preliminary Design: Section 1.2 correction – include Pond R4.
<b>L-CMP-35</b>	30. Appendix O Ravenswood Ponds R3, R4, R5, and S5 Restoration Preliminary Design: Section 2.1 of this report notes the following constraint, “Flooding. The primary constraint on the introduction of tidal action is that flooding could occur unless additional flood protection is provided. Thus, in order to introduce tidal action to Pond R4, additional flood protection must be provided. Some locations of flood control levees (e.g. along Highway 84) are logistically impossible within the desired schedule due to ownership and easement considerations.” This statement requires further clarification. Will the proposed alternatives that introduce tidal action to Pond R4 result in flooding? The proposed alternatives considered do not include any modifications to the levees along Highway 84 that would address this effect. This constraint contradicts one of the objectives of the restoration effort, which is to maintain or improve flood protection. The City does not support modifications that would reduce the current level of flood protection, which appears to be the case relative to flood protection along Hwy 84.
<b>L-CMP-36</b>	31. Appendix O Ravenswood Ponds R3, R4, R5, and S5 Restoration Preliminary Design Section 2.2 Design Considerations Flood Retention: The use of Ponds R5/S5 as detention basins to be used during storm events will help alleviate flooding in the cities of Redwood City, Menlo Park, and San Mateo County as stormwater contributions are from portions of the cities of Redwood City, Atherton, Woodside, and San Mateo County. The Bayfront Canal serves all these jurisdictions.
<b>L-CMP-37</b>	32. Appendix O Ravenswood Ponds R3, R4, R5, and S5 Restoration Preliminary

**L-CMP-37  
cont.**

Design Figures 3.1 and 3.2: Please label the All American Canal.

**L-CMP-38**

33. Appendix O Ravenswood Ponds R3, R4, R5, and S5 Restoration Preliminary Design Figure 3.5: Please include the existing levee elevations in the figure.

**L-CMP-39**

34. Appendix O Ravenswood Ponds R3, R4, R5, and S5 Restoration Preliminary Design Figure 3.8: Please include the existing levee elevations in the figure and label all the waterways.

**L-CMP-40**

35. Appendix O Ravenswood Ponds R3, R4, R5, and S5 Restoration Preliminary Design Section 4.1.2: Alternatives B, C, and D propose improvements to the levee on the southern section of R4 along the All American Canal. The levee to the north of R4, which is at an elevation of 9.4 feet NAVD 88 would be breached and the levee to the south would be improved and raised to an elevation of 9.0 feet NAVD 88. The preliminary design report notes that "The levee improvements would provide similar level of flood protection after levee breaching as provided by the existing northern R4 levee (i.e. match existing outboard levee elevations) in order to meet the Maintain Existing Flood Protection Objective in Section 2B." It is unclear how the existing flood protection will be maintained as the improved levee will be lower than the northern R4 levee (which will be breached). Also, the main text of the DEIS/R notes that the restoration effort will result in long-term flood protection. This preliminary design document / Appendix O does not provide information relative to long-term flood protection. In addition, the main text of the DEIR/S notes that the levee improvements along the All-American Canal will prevent tidal overtopping and preclude flooding caused by sea level rise. How does the hydraulic modeling developed support this statement?

We want to thank you for the opportunity to comment on the Draft Environmental Impact Statement Report - Phase 2 of the South Bay Salt Pond Restoration Project. Please feel free to contact me at 650-330-6742 if you have any questions regarding the comments provided in this letter.

Sincerely,



Azalea A. Mitch  
Senior Civil Engineer

**City of Menlo Park (40 comments)**

**L-CMP-1**

This is an overview comment on several aspects of flood control and flood protection. Some of these are addressed in more detail in subsequent comments and responses. However, the main point of this overview comment is that the existing levels of flood protection provided by the former salt production pond berms must – at a minimum – be maintained. The SBSP Restoration Project agrees with this comment and has taken steps to ensure that the existing levels of protection will be maintained. The primary means of that protection is the improvement (elevation increase and widening) of the levees around the All-American Canal (AAC), as well as the construction of a habitat transition zone projecting into Pond R4. The improvements to the AAC levees would offset the loss of Pond R4 as a temporary basin into which the highest tidal water and/or wind-driven waters from the bay could flow. The specifics of these improvements are noted in the appropriate places below. The in-text reference to State Route (SR) 84 was intended as a counterpoint to the improvement of the AAC levees. To clarify: the decision to convert Pond R4 to tidal marsh while keeping Pond R3 as a seasonally dry pond for western snowy plover nesting necessitated the improvement of the AAC levees instead of the southern border of Pond R3 adjacent to SR 84. Providing flood protection adjacent to SR 84 could work, but it would not keep Pond R3 as dry and thus would not be as effective as western snowy plover habitat. As importantly, improving the AAC levees still allows Pond R3 to provide an additional level of “emergency” protection from high waters, in the unlikely event that the AAC levee is overtopped. That would not be the case if the equivalent protection were provided along the southern border of Pond R3.

**L-CMP-2**

As described in Master Comment Response #4, the Bayfront Canal and Atherton Channel (BCAC) Project could not be included in the Preferred Alternative because of the lack of a water quality monitoring and control plan approved by the Regional Water Quality Control Board (RWQCB). However, nothing in this Phase 2 decision precludes future inclusion of the BCAC Project, as long as water quality standards are met and sufficient environmental impacts analysis and disclosure are undertaken under NEPA and CEQA.

**L-CMP-3**

This comment is about sea-level rise and whether or not the proposed levee improvements account for it. The SBSP Restoration Project’s goal and responsibility is to maintain or improve the existing (i.e., the current) levels of flood control, and the Phase 2 designs have been conducted to fulfill that responsibility. The SBSP Restoration Project does not intend its Phase 2 actions to provide long-term protection against sea-level rise. (Master Comment Response #10 addresses some aspects of the topic of sea-level rise.) In general, the Draft EIS/R and Final EIS/R were clear in limiting the protection that would be provided to maintaining the current, existing levels of protection. However, this comment (as well as the numbered comment 21 in the City’s comment letter) noted that there was text in Section 3.4 that misstated the protection and did mention ongoing protection against sea-level rise. The Phase 2 project’s levee improvements would prevent overtopping and flooding into developed areas, roads, etc. to the same extent that the current conditions do, but there would be no protection against sea-level rise. This error does not change the significance determination of a less-than-significant (LTS) effect in that particular

listed impact (Phase 2 Impact 3.4-1: Potential effects from settlement due to consolidation of Bay mud) nor from any other of the listed impacts. That LTS determination is correct.

This comment also suggests that the AAC levees be improved to an elevation of 11 feet NAVD88 instead of the 10 feet elevation NAVD88 listed in the Draft EIS/R. The next step of designs is underway and is considering an elevation of 11 feet NAVD88. While the SBSP Restoration Project believes that the current design will satisfactorily address flood protection concerns, the project will continue to work with the City of Menlo Park to consider additional design improvements.

#### **L-CMP-4**

Similar to comment L-CMP-3 and the response to it, the Preferred Alternative's improvements at the AAC levees would also fill the AAC and create a single, wider levee than what is there now. That widening matches what is proposed in this comment. The Preferred Alternative would also add a habitat transition zone to extend into Pond R4, which would provide additional protection against wave run-up and subsequent overtopping. The SBSP Restoration Project believes that these design improvements will satisfactorily address the City of Menlo Park's concerns about this aspect of flood protection.

#### **L-CMP-5**

This comment expresses the City's support for Alternative Ravenswood D and explains the reasons for that preference. The Preferred Alternative does include the public access trail around Ponds R5 and S5 to connect to the Bay Trail, as requested in this comment. Several other elements of Alternative Ravenswood D are also included in the Preferred Alternative; however, as the response to comment L-CMP-2 notes, the BCAC Project could not be included.

#### **L-CMP-6**

The title of Figure ES-12 has been corrected as suggested by this comment.

#### **L-CMP-7**

This comment refers to the Executive Summary text, which is properly an overview of the main text. The main text's reference to the required additional flood protection is that which would be provided by the improvements to the AAC levees described in Chapter 2 and in the preliminary design memoranda. This comment also refers to constraints mentioned in Appendix O. Those constraints are presumably the list of design constraints in Section 2.1 of Appendix O. The items in that list were implicitly addressed in the selection and the design of the Phase 2 project at Ravenswood, as evidenced by – for example – the retention of Pond R3 as habitat for western snowy plover and other small shorebirds, the decision to improve the AAC levees for flood protection, the elimination of the project component that would have added a public access trail at the northwestern corner of Pond R4, and so on. The EIS/R did not specifically point the reader back to each of the items in that list, but they were very much part of the decision, the designs, and the environmental impact assessment. Finally, the comment letter also refers to numbered comment 30 in the City's letter (which is Comment L-CMP-35 in this numbering system); the response to that comment addresses those specifics in more detail.

#### **L-CMP-8**

This comment requested text changes to reflect that the stormwater carried by the Bayfront Canal and Atherton Channel was not only from Redwood City but was also from Menlo Park, Atherton, Woodside, and unincorporated portions of San Mateo County. In the Final EIS/R, that clarification was made in several different places, including Chapter 2 (Alternatives) and Section 3.2 (Hydrology). It was also made on page ES-51 in the Executive Summary of the Final EIS/R. It was not, however, made in the specific location referred to in this comment.

**L-CMP-9**

The SBSP Restoration Project does not intend the proposed levee improvements to raise the level of protection to that which would enable FEMA certification or 100-year flood protection. The SBSP Restoration Project is committed to maintaining existing levels of flood protection and also seeks to improve current and future flood protection where practicable.

**L-CMP-10**

This comment correctly notes that implementation of the BCAC Project would require a multijurisdictional effort involving several cities and San Mateo County, not merely Redwood City. As described in Master Comment Response #4 and in the response to Comment L-CMP-2 above, the BCAC Project could not be included in the Preferred Alternative for Phase 2.

**L-CMP-11**

See response to Comment L-CMP-8. The clarification about the sources of stormwater was made at several locations in the Final EIS/R.

**L-CMP-12**

This comment misstates the flood protection that would be provided by the various action alternatives at the Ravenswood Ponds, as they were presented in the Draft EIS/R. All three action alternatives (Alternatives Ravenswood B, C, and D) would have provided some flood protection components. Those components includes the improvements to the AAC levees in all three of those alternatives, as well as various numbers and locations of habitat transition zones that would have helped the reduce wave run-up. By maintaining the current levels of protection provided by the former salt pond berms, those actions kept Impact 3.2-1 (the one related to increased risk of flooding) at levels that would be less than significant (LTS). In addition to that, Alternative Ravenswood D, by incorporating the BCAC Project, could have brought a reduction in the severity and frequency of inland flooding from fluvial flows (stormwater runoff). That is why Alternative Ravenswood D would have also brought a benefit – a determination that is realized only by NEPA and not by CEQA – and why Impact 3.2-1 was found to be less than significant/beneficial (LTS/B). As noted in several previous responses, however, the BCAC Project could not be included. The Final EIS/R lists the Preferred Alternative’s significance determination for Impact 3.2-1 as “LTS”.

**L-CMP-13**

This comment suggested showing the elevations of all existing levees on the maps in the EIS/R. Since elevation data would make the maps difficult to read, the EIS/R only shows elevations in Figure 3.2 in

Appendix O, which was a technical appendix to develop designs sufficient to inform the environmental impact analysis. Section 3.2 of that appendix describes the sources and methods of the elevation data and how it was used in the model. The SBSP Restoration Project provided the elevation data to the City of Menlo Park in August of 2015 and can provide this information if requested to interested parties.

**L-CMP-14**

As noted in the response to comment L-CMP-1 and others, the addition of flood protection necessary to offset the opening of Pond R4 to tidal flows would be provided by the improvement of the AAC levees. More detail is provided in the response to the comment numbered 30 in the City's letter (Comment L-CMP-35 in this response document).

**L-CMP-15**

This comment requested inclusion of the existing elevation of the levee on the eastern side of Pond R4. The SBSP Restoration Project used elevations for this and other levees that was derived from LiDAR data, as described in Section 3.1 of Appendix O (the Preliminary Design Memorandum) to the EIS/R. See also the response to Comment L-CMP-13, which requested inclusion of similar elevation data.

**L-CMP-16**

This comment requested inclusion of the existing elevation of the levees around the All-American Canal. The SBSP Restoration Project used elevations for this and other levees that were derived from LiDAR data, as described in Section 3.1 of Appendix O (the Preliminary Design Memorandum) to the EIS/R. See also the response to Comment L-CMP-13, which requested inclusion of similar elevation data.

**L-CMP-17**

This comment expresses the City of Menlo Park's support for the inclusion of trail segment that would complete a loop trail around Ponds R5 and S5 to connect to the Bay Trail spine to the south. That trail option is included in the Preferred Alternative.

**L-CMP-18**

The clarification about the sources of stormwater was made to this section of the Final EIS/R, which is now on page 2-60.

**L-CMP-19**

The proposed improvements to the AAC levees would be sufficient to offset the loss of Pond R4 and to create a new "bayward" outer boundary between tidal flows in the bay and the non-tidal portions of the Phase 2 Ravenswood pond complex. The elevation of the AAC levee improvements was proposed in the Final EIS/R at 10 feet NAVD88, but the next step of designs is considering an elevation of 11 feet NAVD88. These improvements would be graded to meet those of the eastern levee of Pond R3, as the question asks, but the Pond R3 outer levees would not be raised or otherwise improved. A tidal flow that would overtop Pond R3's eastern levee under the existing condition could still do so under the proposed alternative.

This comment also asks about the text in the section's opening paragraph, which notes additional flood protection. The additional flood protection referred to is the improvement (raising and widening) of the AAC levees. It also refers to the addition of various habitat transition zones, which help protect against wave run-up.

**L-CMP-20**

This comment notes that the SBSP Restoration Project will need to develop a traffic control plan for the City's review and approval. The SBSP Restoration Project agrees with this comment and will do so at the appropriate time, as part of developing more detailed construction plans and obtaining permits.

**L-CMP-21**

This comment notes that the SBSP Restoration Project will need to coordinate with the City's and other agencies to coordinate staging areas for project activities. The SBSP Restoration Project agrees with this comment and will do so at the appropriate time, as part of developing more detailed construction plans and obtaining permits.

**L-CMP-22**

This comment references a portion of the Operations and Maintenance section of Chapter 2, Alternatives, about levee maintenance and FEMA certification. As noted in the response to Comment L-CMP-9, the current plans for the levee improvements would not be to FEMA-certification levels. The statement referred to in the comment is a hypothetical one, which simply notes that (emphasis added) "*if* the levees that provide flood protection are improved to provide FEMA 100-year flood protection..." more detailed maintenance plans would be needed. The proposed Phase 2 actions would not provide that level of protection, though it could be added at a future time or by a related project.

**L-CMP-23**

As noted in the responses to Comments L-CMP-9 and L-CMP-22, there is no intent to design or build FEMA certified levees. The comment also asks about the design report's discussion of SR 84. The preliminary design memorandum provided as Appendix O mentions SR 84 only in the negative; i.e., it notes that providing the necessary flood protection by improving levees along SR 84 are not feasible at the current time. That is one of the reasons why the improvements to the levees around the AAC were developed and included in the alternatives instead.

**L-CMP-24**

This comment expresses the City's support for Alternative Ravenswood D because of the increased level of local protection against fluvial flooding it would have provided. As described in Master Comment Response #4, the Bayfront Canal and Atherton Channel (BCAC) Project could not be included in the Preferred Alternative because of the lack of a water quality monitoring and control plan approved by the Regional Water Quality Control Board (RWQCB). However, nothing in this Phase 2 decision precludes future inclusion of the BCAC Project, as long as water quality standards are met and sufficient environmental impacts analysis and disclosure are undertaken under NEPA and CEQA.

**L-CMP-25**

This comment is about the management of the enhanced managed ponds proposed for Ponds R5 and S5 and how water quality concerns (most notably algal blooms) would be avoided. The SBSP Restoration Project is currently working on detailed design of three water control structures that would be sized and placed to allow draining and filling of these ponds into or from Pond R4, Pond R3, and/or Flood Slough in sufficiently short periods of time that adverse water quality conditions can be avoided. The staff of the U.S. Fish and Wildlife Service's Don Edwards San Francisco Bay National Wildlife Refuge would be responsible for operating the water control structures and monitoring the water quality conditions. The planned conditions could be similar to those of the muted tidal pond just north of the Pond S5 triangular forebay that the City of Menlo Park operates, but with three water control structures instead of one, there would be greater control of elevations and conditions.

**L-CMP-26**

As in the response to Comment L-CMP-3, this comment is about sea-level rise and whether or not the proposed levee improvements account for it. The SBSP Restoration Project's goal and responsibility is to maintain or improve the existing (i.e., the current) levels of flood control, and the Phase 2 designs have been conducted to fulfill that responsibility. The SBSP Restoration Project does not intend its Phase 2 actions to provide long-term protection against sea-level rise. (Master Comment Response #10 addresses some aspects of the topic of sea-level rise.) In general, the Draft EIS/R and Final EIS/R were clear in limiting the protection that would be provided to maintaining the current, existing levels of protection. However, this comment noted that there was text in Section 3.4 that misstated the protection and did not mention ongoing protection against sea-level rise. The Phase 2 project's levee improvements would prevent overtopping and flooding into developed areas, roads, etc. to the same extent that the current conditions do, but there would be no protection against sea-level rise. This error does not change the significance determination of a less-than-significant (LTS) effect in that particular listed impact (Phase 2 Impact 3.4-1: Potential effects from settlement due to consolidation of Bay mud) nor from any other of the listed impacts. That LTS determination is correct.

**L-CMP-27**

The clarification about the sources of stormwater was made to Section 3.4 of the Final EIS/R. However, the portion of text specifically referenced in this comment is not about the location of the sources of the stormwater carried by the Bayfront Canal and the Atherton Channel themselves. Rather, the referenced text is about the primary proponent of the Bayfront Canal and Atherton Channel Project, which is the City of Redwood City, as the text states. This comment also correctly notes that implementation of the BCAC Project would require a multijurisdictional effort involving several cities and San Mateo County, not merely Redwood City.

**L-CMP-28**

This comment expresses the City's support for Alternative Ravenswood D because of the increased level of local protection against fluvial flooding it would have provided by the inclusion of the BCAC Project. See responses to several previous comments and Master Comment Response #4 about why that project is not included in the Preferred Alternative.

**L-CMP-29**

The clarification about the sources of stormwater was made in several places in the Final EIS/R. However, the portion of text specifically referenced in this comment is not about the location of the sources of the stormwater carried by the Bayfront Canal and the Atherton Channel themselves. Rather, the referenced text is about the primary proponent of the Bayfront Canal and Atherton Channel Project, which is the City of Redwood City, as the text states. This comment also correctly notes that implementation of the BCAC Project would require a multijurisdictional effort involving several cities and San Mateo County, not merely Redwood City.

**L-CMP-30**

See the responses to comments L-CMP-27 and L-CMP-29.

**L-CMP-31**

This comment expresses support for the additional public access and recreation features presented as part of Alternatives Ravenswood C and D. Chapter 6 of the Preferred Alternative in the Final EIS/R describes the additional public access in the form of the loop trail around Pond R5 and S5 (support for which was expressed in other comments in this comment letter) as well as a modified and enhanced viewing platform along that trail. The trail at the northwest corner of Pond R4 was not included due to concerns about adverse impacts on wildlife from a recreational trail placed here.

**L-CMP-32**

See the response to Comment L-CMP-27.

**L-CMP-33**

This comment correctly notes the need to coordinate construction activities in all project action alternatives with the City of Menlo Park and other entities in order to minimize impacts to Bedwell Bayfront Park and maintain accessibility. The SBSP Restoration Project is committed to that coordination and to minimizing disruption to the maximum extent possible.

**L-CMP-34**

This comment requests the correction of a typographical error in Appendix O (“Pond R5” appeared twice instead of Pond R4 once and R5 once. The SBSP Restoration Project acknowledges this error and appreciates the correction. However, Appendix O is a preliminary design memorandum that was used to provide enough detail on a range of project alternatives to conduct impact assessments for the Draft EIS/R. It is a completed document and need not be changed at this point. The rest of the text in that memorandum and in the EIS/R itself is clear in addressing Pond R4 as part of Phase 2.

**L-CMP-35**

This is a comment that was listed as #30 in the City’s comment letter and that was referred to in several other comments in that letter. It asks about several aspects of flood control and flood protection. This comment asks about whether the introduction of tidal flows into Pond R4 would result in flooding. The text states that, without the provision of some additional flood protection as part of the various action alternatives, the risk of tidal flooding could increase. The SBSP Restoration Project is committed to

maintaining existing levels of flood protection and has taken included these additional flood protection measures. The primary means of that protection is the improvement (elevation increase and widening) of the levees around the All-American Canal (AAC), as well as the construction of a habitat transition zone projecting into Pond R4. The improvements to the AAC levees would offset the loss of Pond R4 as a temporary basin into which the highest tidal water and/or wind-driven waters from the bay could flow.

The comment also asks about levee improvements at the southern border of the Ravenswood pond complex adjacent to SR 84. The in-text reference to SR 84 was intended as a counterpoint to the improvement of the AAC levees. To clarify: the decision to convert Pond R4 to tidal marsh while keeping Pond R3 as a seasonally dry pond for western snowy plover nesting necessitated the improvement of the AAC levees instead of the southern border of Pond R3 adjacent to SR 84. Providing flood protection adjacent to SR 84 could work, but it would not keep Pond R3 as dry and thus would not be as effective as western snowy plover habitat. As importantly, improving the AAC levees still allows Pond R3 to provide an additional level of “emergency” protection from high waters, in the unlikely event that the AAC levee is overtopped. That would not be the case if the equivalent protection were provided along the southern border of Pond R3.

**L-CMP-36**

This comment is about how Appendix O described the sources of stormwater carried by the Bayfront Canal and Atherton Channel. This clarification about the sources of stormwater was made in several places in the Final EIS/R, but Appendix O is a preliminary design memorandum that was used to provide enough detail on a range of project alternatives to conduct impact assessments for the Draft EIS/R. It is a completed document and need not be changed at this point.

**L-CMP-37**

This comment requests the labeling of the All American Canal in Appendix O. As in several previous comments, Appendix O is a preliminary design memorandum that was used to provide enough detail on a range of project alternatives to conduct impact assessments for the Draft EIS/R. It is a completed document and need not be changed at this point. The AAC is labeled in the maps in the main text itself.

**L-CMP-38**

As in the responses to the previous comment, Appendix O to the Draft EIS/R is a preliminary design memorandum that was used to provide enough detail on a range of project alternatives to conduct impact assessments for the Draft EIS/R. It is a completed document and need not be changed at this point.

**L-CMP-39**

As in the responses to the previous comment, Appendix O to the Draft EIS/R is a preliminary design memorandum that was used to provide enough detail on a range of project alternatives to conduct impact assessments for the Draft EIS/R. It is a completed document and need not be changed at this point.

**L-CMP-40**

The first point in this comment is about the elevation of the improved levees at the AAC. The Final EIS/R lists the elevation of the improved AAC levees as being built to elevation 10.0 feet NAVD88, not to 9 feet

## Exhibit 7: Comments

NAVD88, as initially described in the preliminary design memorandum. The ongoing work on more detailed designs for permitting will use this higher elevation. This comment's other main point is about sea-level rise and long-term protection. The responses to comments L-CMP-3 and L-CMP-26, as well as Master Comment Response #10, address the question of sea-level rise, which the SBSP Restoration Project's levee improvements are not intended to address. The long-term protection against coastal flooding would come from having more resilient tidal marshes and habitat transition zones established in place of the un-engineered former salt-production pond berms that are currently present.

## Exhibit 7: Comments

**From:** Buxton, Brenda@SCC  
**To:** ["Zsutty, Yves"](#)  
**Subject:** RE: Comments: EIS Salt Pond  
**Date:** Monday, May 02, 2016 1:22:00 PM

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Dear Yves,

Thanks for your comments. As this is the Final EIS/R, I'm not going to be able to update the maps with this information but I will be able to correct it in future presentations and exhibits. In regards to your other comments, since there are no recreational or trail improvements in the City of San Jose proposed as part of Phase 2, we did not go into detail about the City of San Jose trail alignments and status. (The recreational improvements are in Menlo Park and Mt. View.) However, as you know, I am aware of the trail gap at Gold Street and hope that we will have an opportunity to work together and complete this critical trail gap.

Brenda

Brenda Buxton  
Deputy Program Manager, Bay Conservancy Program  
Coastal Conservancy  
1330 Broadway 13th Floor  
510-286-0753  
[brenda.buxton@scc.ca.gov](mailto:brenda.buxton@scc.ca.gov)

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**From:** Zsutty, Yves [mailto:[Yves.Zsutty@sanjoseca.gov](mailto:Yves.Zsutty@sanjoseca.gov)]  
**Sent:** Tuesday, April 26, 2016 3:22 PM  
**To:** Buxton, Brenda@SCC  
**Subject:** Comments: EIS Salt Pond

Brenda,

I wanted to provide you with a few comments on the document.

- Figure ES-10: There is no "existing trail" between Gold Street and the entrance to the County Marina. The surface maintenance road is not a recreational resource. There is no under-crossing beneath Gold Street or the railroad tracks.
- General: The report uses the term "Safe" for trail operations. Be mindful that a well-designed trail may not necessary always be safe for a wide variety of reasons. You may wish to use the term "more safer".
- Table 3.6-2: The reference to "Guadalupe River Trail" should indicate that the Bay Trail Spine will require under-crossings and a bridge to close the gap to the trail. I'm open to discussing if there's an opportunity to partner on this deliverable.
- General: I'd like to see some language that will permit an agency to pave the trail in the future if demand justifies the improvement. San Jose seeks to have a continuous trail network, and a paved surface is a common feature that draws users.
- The report should reference the City of San Jose's planning documents for the Bay Trail that overlap the planning area: <http://www.sanjoseca.gov/index.aspx?nid=2772>

**Yves Zsutty**, Trail Manager

City of San José

Department of Parks, Recreation and Neighborhood Services

200 East Santa Clara Street, San José, CA 95113

Trail Program [web site](#)

408.793.5561, fax 408.292.6416

**On Social Media:**

Twitter: SanJoseTrails

Instagram: SanJoseTrails

Periscope: San Jose Trails

**Trail Resources**

408 793-5510 (Park Concerns)

866 249-0543 (Graffiti Hotline)

408 510-7600 (City's Homeless Helpline)

## Exhibit 7: Comments

**From:** Buxton, Brenda@SCC  
**To:** "[Robert J Greenhouse](#)"  
**Subject:** RE: Heavy Metal Content of the Mud Which Makes Up the Levees  
**Date:** Wednesday, May 04, 2016 3:49:00 PM

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Dear Mr. Greenhouse:

Thanks for your interest in the SBSP Restoration Project. I have never heard of any concerns regarding the levee dust. I quickly reviewed the Phase 2 assessment performed on the Alviso and Ravenswood ponds for the USFWS in Dec. 2002 as part of the acquisition and it says "Concentrations of most elements in sediments from the salt evaporation ponds are at Bay ambient concentrations or at concentrations that are not of concern." (p. B12). The vast majority of the report focuses its discussion on the high levels of mercury in the pond sediments due to upstream historic mercury mining.

As a result, the project has spent a lot of time studying mercury. However, we've focused on mercury's role in the water where it can methylate and then bioaccumulate in the aquatic foodweb. There's a lot of information on mercury research at our website [www.southgbayrestoration.org](http://www.southgbayrestoration.org) but I don't believe there's anything that addresses dust.

Brenda Buxton

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**From:** Robert J Greenhouse [<mailto:drrobert@stanford.edu>]  
**Sent:** Tuesday, April 26, 2016 9:24 PM  
**To:** Buxton, Brenda@SCC  
**Subject:** Heavy Metal Content of the Mud Which Makes Up the Levees

Dear Ms. Buxton -

I have read with considerable interest your Environmental Impact Study for the impending changes in the Bay Area salt ponds.

One thing which concerns me as a 13+ year user of the levees between the Bay / marsh area and the salt ponds is the heavy metal content of the mud which has been used to form the levees. On hot summer days and on windy days, there is considerable dust in the air as I run the levees and I always worry about the mercury / lead / cadmium and other heavy metals in the dust which I am breathing.

Exhibit 7: Comments

Has anyone analyzed the dry mud on the levees and done a hazard assesment for those who traverse these areas on a regular basis?

Best regards,

Robert Greenhouse  
(510) 673-8041 (cell)

## Exhibit 7: Comments

**From:** Buxton, Brenda@SCC  
**To:** ["Fred Krieger"](#)  
**Subject:** RE: FINAL Phase 2 Alviso/Ravenswood Environmental Document NowAvailable  
**Date:** Wednesday, May 04, 2016 2:47:00 PM

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Dear Mr. Krieger:

Thank you for your interest in the South Bay Salt Pond Restoration Project. You may certainly send comments by email but since this is the Final EIS/R we are not planning to prepare responses at this time.

Since the total tidal prism of the South Bay (below the Oakland-SF Bay Bridge) is 666,000 acre feet and we're only proposing to open 970 acres to unrestricted tidal flows, this project will not have noticeable effects on the tidal prism of the Bay. However, there will be some local effects on scour and sedimentation and these are discussed in Chapter 3.2 Hydrology and under the Hydrology, Flood Management, Infrastructure section (pp. 4-17 to 4-24) of Chapter 4 Cumulative Impacts.

Brenda Buxton

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**From:** Fred Krieger [<mailto:fkrieger@msn.com>]  
**Sent:** Tuesday, April 26, 2016 2:33 PM  
**To:** Buxton, Brenda@SCC  
**Subject:** FW: FINAL Phase 2 Alviso/Ravenswood Environmental Document NowAvailable

Hello Ms. Buxton – Are you only accepting comments in writing or may they also be submitted via email. Also, since this is the final EIS/EIR will the program prepare responses. I'm mainly interested in the cumulative impacts of the increase in the tidal prism resulting from restoration projects. These should be mostly beneficial but they should be addressed. Thanks

Fred Krieger  
510 843-7889

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**From:** South Bay Salt Pond Restoration Project [<mailto:sbsp-maillist=southbayrestoration.org@mail16.suw13.rsgsv.net>] **On Behalf Of** South Bay Salt Pond Restoration Project  
**Sent:** Tuesday, April 26, 2016 1:39 PM  
**To:** [fkrieger@msn.com](mailto:fkrieger@msn.com)  
**Subject:** FINAL Phase 2 Alviso/Ravenswood Environmental Document NowAvailable

[View this email in your browser](#)

The South Bay Salt Pond Restoration Project has finalized the Environmental Impact Statement/Report for its planned Phase 2 restoration, public access and flood protection construction at the Alviso and Ravenswood ponds.

The document is now available for download on the project website at <http://www.southbayrestoration.org/planning/phase2/FEISRdownload.html>.

More information about the environmental document is on the Project website at <http://www.southbayrestoration.org/planning/phase2/>.

**To Comment:**

While this is the final version of the environmental analysis document, public comments are being accepted. They can be submitted in writing, or presented orally at a May 26, 2016, meeting of the Governing Board of the California State Coastal Conservancy in Sacramento.

Submit in writing, with the name of your contact person, to:

Brenda Buxton, Deputy Bay Program Manager

State Coastal Conservancy

1330 Broadway, 13th Floor

Oakland, CA, 94612

[Brenda.buxton@scc.ca.gov](mailto:Brenda.buxton@scc.ca.gov)

510-286-0753

Comment at the May 26, 2016 Conservancy Board meeting.

**Please check the Conservancy's website at <http://scc.ca.gov> as the time and location may change.**

The meeting is currently scheduled for 10:00 a.m. at:

The Tsakopoulos Library Galleria

828 I Street

Sacramento CA

**Next Steps:**

On May 26, related to Phase 2, the Conservancy Board will consider:

- Certification of the EIS/EIR;
- Approval of the Preferred Alternative as defined in that EIS/EIR;
- Adoption of the Mitigation Monitoring and Reporting Program; and
- Authorization to disburse up to \$13,694,629 to Ducks Unlimited, Inc. for implementation of two South Bay Salt Pond Restoration Project Phase 2 projects.

### **Hard Copies Available for Review**

Hard copies of the document are also available for public review, during business hours, at:

- Don Edwards San Francisco Bay National Wildlife Refuge Headquarters, 1 Marshlands Road, Fremont, CA 94555, [http://www.fws.gov/refuge/don\\_edwards\\_san\\_francisco\\_bay/](http://www.fws.gov/refuge/don_edwards_san_francisco_bay/), 510-792-0222, ext. 363, [[map](#)]
- State Coastal Conservancy, 1330 Broadway, 13th Floor, Oakland, CA 94612, <http://scc.ca.gov/>, 510-286-1015 [[map](#)]
- US Army Corps San Francisco District, 1455 Market Street, San Francisco, CA 94103, <http://www.spn.usace.army.mil/>, 415-503-6804 [[map](#)]
- Santa Clara Valley Water District administration building, 5750 Almaden Expressway, San Jose, CA 95118, [www.valleywater.org](http://www.valleywater.org), 408-265-2600 [[map](#)]

Copies of the document will also be available for public review at several area libraries – see <http://www.southbayrestoration.org/planning/phase2/> for details.

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You requested to be kept apprised of any developments concerning the project.

**Our mailing address is:**

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