



City of Palo Alto

City Council Staff Report

(ID # 6195)

Report Type: Consent Calendar

Meeting Date: 10/26/2015

Summary Title: Comments on Salt Pond Restoration Project Phase 2 EIR/EIS

Title: Comments on the Salt Pond Restoration Project Phase 2 Environmental Impact Report/Environmental Impact Statement

From: City Manager

Lead Department: Public Works

Recommendation

This is a report on the attached comments on the Environmental Impact Statement/Report (EIS/EIR) for Phase 2 of the Salt Pond Restoration Project. The item has been placed on Consent to allow the Council to approve the comments being sent. The deadline for submission is October 30, 2015.

Background

San Francisco Bay has lost an estimated 85 percent of its historic wetlands. This dramatic decline in tidal marsh habitats has caused populations of marsh-dependent fish and wildlife to dwindle. It has also decreased water quality and increased local flood risks. In 2003, under the leadership of Senator Dianne Feinstein, the South Bay Salt Ponds were acquired from Cargill Inc. Funds for the acquisition were provided by federal and state resource agencies and several private foundations. The South Bay Salt Pond Restoration Project is the largest tidal wetland restoration project on the West Coast. When complete, the project will restore 15,100 acres of industrial salt ponds.

The goals of the project are to:

- Restore and enhance a mix of wetland habitats.
- Provide wildlife-oriented public access and recreation.
- Provide for flood management in the South Bay.

Shortly after the property was acquired, the California Department of Fish and

Wildlife, the U.S. Fish and Wildlife Service, and the California Coastal Conservancy launched a four- year public process to design a restoration plan for the property. The final plan was adopted in 2008 and the first phase of restoration started later that year.

Phase 1 of the plan has now been implemented, including the restoration of over 3,000 acres of marsh habitat in the three pond complexes (Eden Landing in Alameda County, Ravenswood in San Mateo County and Alviso in Santa Clara County) and completion of public access opportunities and Bay Trail segments.

The U.S. Fish and Wildlife Service and California Coastal Conservancy released an EIS/EIR for Phase 2 of the restoration project in July 2015.

Discussion

Phase 2 of the plan will restore or enhance an additional 2,400 acres of former salt ponds, including Ponds A1 and A2W, located in the Alviso Pond Complex in Mountain View near Palo Alto. The following restoration alternatives were analyzed in the EIS/EIR for the two ponds:

- Alternative A: No Action; maintain ponds as they are.
- Alternative B: Restore Ponds A1 and A2W and raise and improve levee on the Mountain View side of Charleston Slough.
- Alternative C: Restore Ponds A1 and A2W and integrate Inner Charleston Slough, raise and improve the levee on the Palo Alto side of Charleston Slough.

The City of Mountain View owns Charleston Slough and is under obligation to restore it to tidal habitat as mitigation for earlier projects. Alternative C is advantageous for both Mountain View and City of Palo Alto, as it would integrate the area the City of Mountain View must restore and include raising and improving the levee between Charleston Slough and the Palo Alto flood basin. The restored marsh on the Charleston Slough side would likely provide additional flood protection for the flood basin.

Some stakeholders have raised concern about Alternative C, as it would change existing mudflat habitat where birds are easily visible to tidal marsh. Currently, Charleston Slough serves as easily accessible bird watching area for pedestrians,

therefore providing educational and recreational benefits.

Staff prepared a letter of comment (Attachment A) on the EIS/EIR, which will be signed by the City Manager and submitted to the California Coastal Conservancy by the deadline of October 30, 2015. The comments support raising and improving the levee between the Palo Alto Flood Basin and Charleston Slough, coordination with other levee projects and addressing the loss of wading bird habitat in Charleston Slough.

Timeline

The Salt Pond Restoration project group has set a comment deadline on the EIS/EIR of October 30, 2015.

Resource Impact

There is no resource impact related to the South Bay Salt Pond Restoration project Phase 2 EIS/EIR review. For project implementation, the California Coastal Conservancy is currently pursuing funding options including grants. No City funds are needed for implementing these alternatives. It is envisioned that this project will coordinate levee alignments with the San Francisquito Joint Powers SAFER Bay Initiative feasibility study, in which the City is currently participating.

Attachments:

- Attachment A Comments on Draft Environmental Impact Statement-City of Palo Alto (DOCX)

October 30, 2015

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

Subject: City of Palo Alto Comments on Draft Environmental Impact Statement/Report –
Phase 2 for the South Bay Salt Pond Restoration Project

Dear Ms. Buxton:

The City of Palo Alto appreciates the opportunity to respond to the Draft Environmental Impact Statement/Report (EIS/EIR) for Phase 2 the South Bay Salt Pond Restoration Project.

The City of Palo Alto has the following comments on the Draft EIS/EIR:

1. It is our understanding that the “Alternative Mountain View C” (Alternative C) would support the City of Mountain View’s existing BCDC mitigation requirement. In light of that requirement to restore Charleston Slough to full tidal action, and the improvements that would be made to the levee on the Palo Alto side of Charleston Slough, Palo Alto is supportive of Alternative C. The City of Palo Alto would like to request that the design and layout of the proposed levee improvements between the Palo Alto Flood Basin and Charleston Slough include consideration of balancing the incorporation of “horizontal levee” transition zones on the Flood Basin side of the levee to increase habitat diversity with the need to maintain the Flood Basin’s storage capacity. We are aware that some stakeholders have voiced concern over loss of the existing mudflat habitat within Charleston Slough that is easily accessible to the public. The project should address the impacts of these habitat and accessibility losses.
2. The layout and design of the levee along the Palo Alto Flood Basin for Alternative C should be coordinated with the San Francisquito Creek Joint Powers Authority’s (JPA) SAFER Bay initiative and potential future levee alignments at the Palo Alto Flood Basin that may arise out of the SAFER Bay project. It is possible that a portion of the Palo Alto Flood Basin/Charleston Slough levee improvements included in the Alternative C is not needed depending on the future levee alignment chosen as part of the SAFER Bay initiative. The City requests coordination of the Salt Pond Restoration Project with the SAFER Bay levee project and with the City of Mountain View.

3. Palo Alto is concerned that the project could increase the amount or salinity of the Mountain View landfill leachate. The EIS/EIR analysis focusses on sea water intrusion into the groundwater supply. Since the Mountain View landfill pumps leachate to the City of Palo Alto Regional Water Quality Control Plant (RWQCP), the City is concerned about any increase in sea water intrusion which adversely impacts the salinity of the recycled water produced by the RWQCP.
4. PG&E has not been maintaining their electric transmission towers via the boardwalks recently, and is instead using helicopters to access them. The City suggests that the South Bay Salt Pond Restoration project coordinate with PG&E to verify whether the access boardwalk at the Palo Alto Flood Basin is needed and whether it must be rebuilt as part of this project.

The City of Palo Alto appreciates the work of the California Coastal Conservancy and its partners on this important restoration project. Please contact Kirsten Struve at (650) 329-2421 or Kirsten.struve@cityofpaloalto.org if you have any questions about these comments. In addition, the City would like to designate Kirsten Struve, Manager Environmental Control Programs, Public Works Department, Environmental Services Division, as an alternate for the Salt Pond Restoration Project Stakeholder Forum. Please add her to your stakeholder forum list.

Sincerely,

Jim Keene
City Manager
City of Palo Alto