

**From:** Jack Lucas

**Date:** Tuesday, June 19, 2018 at 12:06 PM

**To:** "Goeden, Brenda@BCDC" <[brenda.goeden@bcdc.ca.gov](mailto:brenda.goeden@bcdc.ca.gov)>

**Subject:** Re: BCDC Board Meeting Agenda June 21, 2018 Item 8 U.S. Fish & Wildlife South Bay Salt Pond Restoration Project, PhaseTwo

Brenda,

In regards the BCDC Board Item 8, the US F&WS South Bay Salt Pond Restoration Project, Phase Two, I would like to comment on how proposed restoration actions coordinate with inland stream dynamics within tributary watersheds.

Initially, would like to say that am adamantly opposed to levee improvement associated with Coast Casey Forebay Levee that would raise its elevation to 14.7 feet NAVD88 and widen its base by 30 to 90 feet, with approximately 39,450 cy of soil deposited in marsh.

This marsh at head of Charleston Slough was long touted as finest marsh in South Bay as it was attested to by waterfowl presence. To further smother it with 40,000 cy of fill can surely not comply with BCDC mandate to preserve San Francisco Bay and wetlands..

Appropriate alternatives analysis would show a preferable location of this 'flood control' levee can be realized some 600 feet inland at Terminal Blvd., former service road for waste management trucks that created Shoreline Park. Elevating access road and parking element could create an esplanade with a panoramic view of bay marshes and ponds. It would more precisely address flood issues of business park and could safely contain COC's of superfund site on Casey Ave from leaching into wetlands and the Bay..

The flood control levee could then extend west of San Antonio Road across former Los Altos Treatment Plant drying ponds, to join with eastern levee of Adobe Creek in Palo Alto Flood Basin. This alignment should preserve historic remnant of Adobe Creek in north west portion of Los Altos Treatment Plant site.

If one reviews a century and a half of maps of South Bay marshes it is easy to identify corkscrew configuration of Charleston Slough with its tributary of Adobe Creek. Could deliver a dissertation as to importance, in light of global warming with its attendant increase in storm intensity, of retaining historic Adobe Creek channel and overflow capability to return to its Charleston Slough outfall to Bay. Proposed flood wall at Coast Casey levee at head of Charleston Slough would preclude any such return to hydrologic determinism.

As to associate actions on Charleston Slough, am opposed to item f., removing water control structure and dredging 1700 cy of soils and sediment to create 110 foot wide breach to allow tidal into Pond A1 from Charleston Slough as believe it will destabilize slough's high tidal mudflat that constitutes a significant foraging habit for shore birds. Also believe management of water control structure has complex negotiated history that cannot be disregarded simply by such an action. Charleston Slough requires outlet to S.F. Bay only!

Permanente Creek has resident run of trout so notch in levee of Pond A2W is not advisable as it could entrain trout into Pond.

Have long had concerns in regards Phase One notch from Guadalupe River into Pond A8. When one observes twenty fisherman at leisure at incoming tidal rush at notch it is hard to believe that fish are not being drawn into pond. As Guadalupe River has salmonid presence it would be essential that migratory anadromous fish not be diverted p pond in inbound or outbound migration. Has a Pond A8 management plan been devised that will close notch during migratory periods? If not, then please require that one be provided.

Another concern about this strong tidal current branching off main stem of Guadalupe River in Alviso is its proximity to the Santa Clara County Marina. As Guadalupe River is Waters of the U.S. and open to navigation and recreation what safety features are now in effect to make certain recreation boaters know of this rather dramatic diversion in Guadalupe River;s current?

Had rather hoped this Phase Two would address retention measures that might be effected on Alviso plain to absorb high riverine flows on both Guadalupe River and Coyote Creek that are integral part of storm systems especially as intensified by climate change. Both river systems have been estimated as capable of generating 23,000 cfs so with reflux from high water in S. F. Bay; this is a considerable amount of flood water to accommodate. Subsidence in Golden Triangle precludes any retention capability upstream so believe this is issue that Salt Pond Restoration needs to address.

Thank you for consideration of my concerns,

Libby Lucas, Yerba Santa Ave., Los Altos, CA