

South Bay Salt Pond Restoration Project Draft EIS/EIR

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Dear Mendel,

It is an important aspect of this DEIR that the Appendices are available to the public and I am not finding them in the Mountain View Library. In particular the DEIR response to my comments referenced Appendix I for the Geomorphic Assessment, Appendix G for Tidal Channel Hydraulic Geometry Analyses, and Appendix J for Hydrodynamic Modeling in regards the tidal prism.

Without this reference data any further comments would be counter productive, however I would like to make an observation that the DEIR 's characterization of Coyote Creek's 'average annual' discharge as 85 cfs, and Guadalupe River's as 70 cfs is highly misleading base data. The COE's 1978 estimation of Guadalupe River peak flows at 1700 cfs has since been found to be an underestimate, while historic drought year records show no flow at all. Imported water has altered base flow criteria, and reservoirs absorb peak storm runoff but California rivers do run to extremes and global warming promises only more dramatic highs and lows.

South Bay sloughs and marshes need to be restored in manner to diffuse flood tide and riverine stormflows. I do not believe there is a reference model (except Holland), but feel restoration must be coordinated with SCVWD and US COE in this initial planning stage. For instance, sloughs and wetlands should be retained inboard of the Alviso Environmental Education Center to absorb overflows from both Coyote and Guadalupe. This is not in SBSP jurisdiction but an extension of San Francisco Bay interface with these river systems.

In regards listing of special status species I did not find Alameda Song Sparrow, Salt Marsh Yellow Throat, California Brown Pelican, Black Crowned Night Heron and Northern Harrier, (library lighting limits review). Some assurance of feeding, nesting and refugia vegetation for these species needs to be addressed. I do support alternative of Bay Trail alignment suggested by NASA as it provides buffer to Western Pond Turtles.

Alternative C treatment of tidal wetlands habitat for AB1, 2AE, and AB2, might be extended further into A3W to reduce concern for pond waterfowl strikes expressed by US Air National Guard. It is a consideration here that duck hunting and consultant auto access onto refuge levees be limited not only to reduce speeds but to manage spread of invasives, such as ditricchia, throughout refuge levee system.

Proposed creation of over forty islands within ponds still appears to be filling of San Francisco Bay. It would seem preferable to create wave deflecting levees within ponds that would support upland marsh vegetation. These could be accessed on occasion for maintenance by portable wooden bridges or walks. It seems to me that every 'enhancement' of salt pond habitat should satisfy more than one goal, preferably three goals.

Would lastly suggest that interface with cities of South Bay be more actively encouraged for education of the body politic and to prepare them for taking over some attendant management and infrastructure costs in regards recreation and public access in general to the National Wildlife Refuge.

Thank you for taking time to review these concerns, and be assured that ultimately what we all want is what is best for sustaining refuge wildlife in as healthy a habitat as possible with its historic diversity of species.

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