



COMMITTEE FOR
GREEN FOOTHILLS



February 23, 2015

Mayor and Councilmembers
City of Foster City
610 Foster City Blvd.
Foster City, CA 94404
council@fostercity.org

RE: Comments on the Proposed Foster City Marina Center Project
for the City Council Second Preliminary Review Special Meeting

Dear Mayor Kiesel and Councilmembers:

Citizens Committee to Complete the Refuge, Save the Bay, San Francisco Baykeeper, Sierra Club Loma Prieta Chapter, Committee for Green Foothills and Sequoia Audubon Society appreciate the opportunity to offer comments on the proposed Foster City Marina Center. We have an interest in this proposed project due to the significant potential environmental impacts the Marina Center Project could have on San Francisco Bay wetlands, intertidal mudflats, wildlife and regionally important open space land.

According to the developer's most recent Marina Center Resubmittal received by the City on February 11, 2015, the proposed project includes 13 acres of residential/commercial development located outboard of the existing Foster City perimeter flood control levee. A multi-use marina would be constructed with launching, landing and support facilities on a naturally occurring oyster shell shoreline, and a pier extending 500 feet into the bay. The pier, a seasonal mooring field and a dredged boat channel would be located within ten acres of publicly-owned waters of San Francisco Bay.

A diversity of important natural habitats found in this area of Foster City have been specifically identified in a number of reports by regional scientists and government agencies as critical for the health of the San Francisco Bay Estuary and for wildlife.

The 1999 *Baylands Ecosystem Habitat Goals Report* makes the following specific recommendations for this segment of the Bay:

- 1) Maintain and enhance tidal marsh and seasonal wetlands
- 2) Protect and improve oyster shell ridges near Foster City to enhance habitat for unique and rare plants and provide high tide roosting sites for shorebirds.

The report specifically identifies the unique restoration opportunity of reintroducing the endangered California sea-blite on sheltered portions of the shell ridges.

The US Fish and Wildlife Service 2013 *Recovery Plan for Tidal Marsh Ecosystems of Northern and Central California* shows all the land in the project parcel as being within the boundary of the Central/South San Francisco Bay Recovery Unit. The boundary line in this plan delineates and identifies highest priority areas for protection of existing habitat, restoration of tidal marsh and restoration of ecotonal habitat in order to accomplish the recovery of endangered and threatened tidal marsh species.

In light of these scientific reports demonstrating a critical need for preservation and restoration of this site, it is very disturbing to see graphics provided by the developer showing that approximately 60% of the land component of the project parcel would be covered with 88,000 cubic yards of fill for the residential/commercial development, or shoreline marina structures and landscaping. Existing tidal marsh, seasonal wetlands and restorable marshland would be lost. According to information in the Marina Center Project Description, a 200 foot length of the existing oyster shell beach used by hundreds of shorebirds as a valuable high tide roost could be impacted - either covered with marina-related amenities and structures or abandoned by the birds due to increased human disturbance from boating activities both on and offshore.

An additional report, the *San Francisco Bay Subtidal Habitat Goals Report*, was released in 2010 by five agencies, including BCDC and the National Marine Fisheries Service. This important report states that subtidal habitat is a critical piece of the San Francisco Bay ecosystem, and subtidal and intertidal mudflats, in particular, support a rich food web of organisms including fish, large numbers of shorebirds, and a diversity of diving ducks.

The Goals in the report focus on protection - preventing loss and increased disturbance of existing mudflat habitat – especially intertidal areas that are exposed at low tide such as the extensive intertidal mudflats offshore in Foster City.

The project's 500 foot long pier out to Belmont Slough, the excavated lagoon near the shoreline and the 200 foot wide dredged waterway from the shoreline to the end of the pier would all be located within valuable intertidal bay mudflats where thousands of over-wintering shorebirds forage.

The marina structures and dredging required for the project's multi-use marina would permanently destroy foraging shorebird habitat, and according to the *Subtidal Habitat Goals Report*, could generate other threats to the intertidal and subtidal mudflats in the area including killing and removing benthic organisms, altering long-term patterns of sediment movement and deposition, and altering current patterns.

This project would face daunting challenges undergoing review and permitting from the seven different regulatory agencies that are charged under state and federal law with protecting San Francisco Bay wetlands, wildlife and aquatic resources. How will these agencies view this threat to bay wildlife and environmentally sensitive natural resources, including possible adverse impacts to the adjacent Redwood Shores Ecological Reserve and the Redwood Shores State Marine Park - a California Marine Protected Area?

In the 1960's and 70's when the Bay was being diked, filled for development and used as a dumping ground for our garbage, we didn't fully understand the importance of tidal wetlands and bay mudflats to the health of the San Francisco Bay Estuary, native wildlife, or the migratory shorebirds and ducks on the Pacific Flyway - now we do.

We hope our comments help you realize early on that the Marina Center project is inappropriate for this environmentally sensitive site. We ask that you do the right thing for San Francisco Bay, and also for the residents of Foster City, by ensuring this beautiful part of the bay is protected and preserved.

Sincerely,



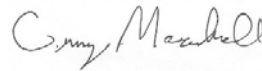
Florence LaRiviere
Chairperson
Citizens Committee to Complete the Refuge



Ian Wren
Staff Scientist
San Francisco Baykeeper



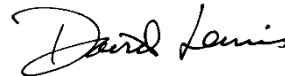
Alice Kaufman
Legislative Advocate
Committee for Green Foothills



Ginny Marshall
President
Sequoia Audubon Society



Mike Ferreira
Chapter Conservation Chair
Sierra Club Loma Prieta Chapter



David Lewis
Executive Director
Save the Bay

Cc: US Army Corps of Engineers
US Fish and Wildlife Service
National Marine Fisheries Service
California Department of Fish and Wildlife
SF Bay Regional Water Quality Control Board
State Lands Commission
Bay Conservation and Development Commission
James Hardy, City Manager
Curtis Banks, Community Development Director
Kohar Kojayan, Planning Manager

References:

Goals Project, 1999, *Baylands Ecosystem Habitat Goals. A report of habitat recommendations prepared by the San Francisco Bay Wetlands Ecosystem Goals Project.* U.S. Environmental Protection Agency, San Francisco, Calif./S.F. Bay Regional Water Quality Control Board, Oakland, Calif.

U.S. Fish and Wildlife Service. 2013. *Recovery Plan for Tidal Marsh Ecosystems of Northern and Central California.* Sacramento, California. xviii + 605 pp.

California State Coastal Conservancy. 2010. *San Francisco Bay Subtidal Habitat Goals Report: Conservation planning for the submerged areas of the bay: 50-year conservation plan.* California Ocean Protection Council., NOAA Restoration Center., San Francisco Bay Conservation and Development Commission., San Francisco Estuary Partnership., & United States National Marine Fisheries Service. State Coastal Conservancy, Oakland, California.