



Friends of Five Creeks

*Volunteers preserving and restoring watersheds of
North Berkeley, Albany, Kensington, south El Cerrito and Richmond since 1996
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May 8, 2023

Berkeley Parks, Recreation, and Waterfront Commission; Parks Director Scott Ferris; Deputy Director Roger Miller; Waterfront Manager Alexandra Endress
Cc: Berkeley City Council, City Manager, City Clerk, Environment and Climate Commission
By email, including to commission secretaries for distribution at first opportunity,

Re: Draft Berkeley Waterfront Specific Plan, comments following webinars May 1 and 3

Council Members, Commissioners, City Manager, Director Ferris, and staff:

Thank you for the opportunity to comment on Berkeley's proposed Berkeley Waterfront Specific Plan following the Parks Department's May 1 and 3 webinars on design guidelines for the draft plan. Having worked as volunteers in the Marina for more than 20 years, Friends of Five Creeks wishes Berkeley the best results in improving recreation, finances, and nature, including resilience, for the area.

We believe that the plan needs stronger and more appropriate guidelines regarding climate change and sea-level rise. Otherwise, attempts to bring financial gains and new opportunities may instead saddle Berkeley with demands for costly protections that it may not be able to provide.

The Marina peninsula consists of unconsolidated fill jutting a third of a mile into San Francisco Bay. Threats from climate change include [sea-level rise](#), frequency and power of storms, [rising groundwater levels](#), [salt intrusion and corrosion of infrastructure](#), and dissemination of toxics. **[No state, regional, or local agency claims that its permit authority protects against these threats.](#)**

- As a simple example, the Bay Conservation and Development Commission's (BCDC) authority extends only 100 feet inland. As the draft plan shows, proposed developments lie almost entirely inland from this narrow band. No one except Berkeley claims permit authority for inland areas.
- The most recent studies by the San Francisco Estuary Institute, NOAA, and others point out that the most serious near-term challenges resulting from climate change in the flatlands from Oakland to Richmond are likely to be rising groundwater and salt intrusion.
- Governor Newsom and state agencies have repeatedly stated that local governments must bear most of the burden of adaptation.
- BCDC, the Association of Bay Area Governments, Metropolitan Transportation Commission, and San Francisco Estuary Institute are urging adjacent local governments facing similar problems to [group themselves into Operational Landscape Units to plan for these challenges](#).

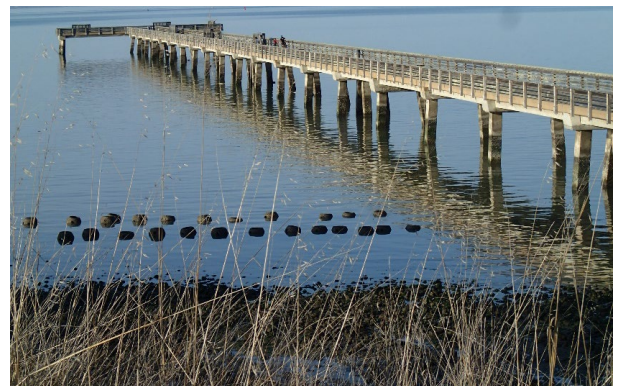
Thus, we believe that Berkeley's draft plan needs wording stronger than the following design guideline: "Sea Level Rise: All proposed re-development projects for recreational or commercial opportunities will comply with state Sea Level permitting guidelines." (([Waterfront Specific Plan May 3 2023 Commercial Redevelopment & Parking](#) Community Workshop, p. 36,) **The plan's guidelines should require at least the following:**

- Developments must be planned to incur no net public expense over their lifetimes, using best available projections from NOAA, BCDC, SFEI, USGS, and other respected authorities.
- All environmental documentation should consider retreat as an alternative.

Friends of Five Creeks also believes that a draft plan should have goals broader and stronger the following: “Stabilize shorelines vulnerable to future sea-level rise, as identified using the 2100 sea level/extreme tide scenario” (p. 22, Waterfront Specific Plan May 1 2023 Nature & Recreation Community Workshop). Sea-level rise may affect areas not identified in the scenario, as projections recognize both a broad range and significant uncertainties, and are frequently revised. [Harm also may come from flooding, groundwater, or salt intrusion even if shorelines are stable.](#)

The draft plan presented at the May 1 workshop cites three “areas of opportunity” for shoreline stabilization. These proposals need improvement.

- On the south shoreline near University Avenue, coir rolls seem worth trying as a way of lessening erosion due to waves.
- On the north shore near the intersection of Marina Boulevard and Virginia Extension, however, shoreline “stabilization” with a sea wall will not prevent flooding. Erosion is not a problem here. Rather, high tides or storm waves for a decade have regularly flooded the bicycle/pedestrian trail and much of Virginia Extension, as can be seen in the 2022 King Tide photo at right. A sea wall would not lessen this flooding or protect the vehicles and road. The same may be true of the flood-prone area at the Doubletree Hotel.
- The suggestion for the Shorebird Park beach is stabilization using reef balls. These irregular lumps of concrete, dotted with hollows, provide habitat for marine plants and animals and lessen the power of waves. The photo right shows them at Pt. Pinole at low tide. These would be a hazard at Shorebird Park beach, which is regularly used to launch and haul out kayaks and boards, including for training and in emergencies. Swimming at Shorebird Beach also is increasingly popular as the Bay warms. Reef balls would shut off both activities.



Thank you for your attention to these points. We would be glad to work with others on better wording.

Sincerely,

Susan Schwartz, President, Friends of Five Creeks