

March 18, 2025 - Agenda Item 5-K Sand replenishment grant application

Dear Mayor and councilmembers,

There are six points in the grant application that are not accurate and need correcting.

- 1) **Point** – Under item #8 in the application regarding problems and benefits, the application states: “The beach supports environmental resources and habitat for San Francisco Bay shorebirds and is the home to the Elsie Roemer Bird Sanctuary.”
Counterpoint – The bird sanctuary is not part of the beach and not part of the landscape where new sand would be delivered to, nor is the project designed to adapt the salt marsh to sea level rise.

- 2) **Point** – Under item #11 describing the history of the project, the application states: “Throughout the beach’s history, different solutions to erosion have been attempted by the U.S. Army Corps, such as structural revetments, but none of them worked successfully.”
Counterpoint – The U.S. Army Corps did not attempt implementing any of the 17 alternatives studied in its 1981 assessment, including the quarry stone structural revetment alternative, because the City and East Bay Regional Park District chose the sand beach alternative. It is not accurate to state that out of all the solutions to erosion “none of them worked successfully,” since most of them have never been implemented. One of them involving a sea wall and raised promenade on the street side of the dune was not considered at the time because it involved fill, which was not going to be approved back then. But today, BCDC’s sea level rise guidelines are different.

- 3) **Point** – Under item #11 describing the history of the project, the application states: “Extensive studies by the U.S. Army Corps in 1980 demonstrated that beach nourishment was the solution that provided protection as well as ecological and recreational benefits.”
Counterpoint – The Corps’ 1981 assessment said the beach alternative provided *economic* and recreational benefits. The ecological benefits were incidental compared with the quarry stone revetment alternative. The beach fill alternative actually made the ecology and habitat worse by eliminating 11 acres of marsh/mudflat.

- 4) **Point** – Under item #11 describing the history, the application states: “The studies in the 1980s judged the benefits associated with recreational uses as being a higher benefit than shoreline protection.”
Counterpoint – Not true. The Corps’ studies in their 1981 assessment did not make that judgment, the City and EBRPD made that judgment call. The Corps’ assessment offered pros and cons for three feasible alternatives.

5) **Point** – Under item #14 describing public assets that the importation of sand onto the beach will protect, the application states: “Elsie Roemer Bird Sanctuary, one of the few remnant salt marshes in the San Francisco Bay”

Counterpoint – The project does not involve designing the salt marsh to withstand sea level rise, and it is an exaggeration to claim that importing sand onto the beach will have any measurable effect on saving the marsh from inundation.

6) **Point** – Under item #36, describing why the constructed or completed project would be superior to other alternatives or other erosion control methods, the application repeats the inaccurate narrative that the U.S. Army Corps of Engineers has tried everything and nothing else has worked. The application then states: “Sand replenishment is the first step and then the mid-term step will be to consider adding more nature-based solutions such as log and rock groins to extend the life of the sand replenishment project.”

Counterpoint – The Corps has *not* tried everything, but they did study every conceivable alternative as part of their 1981 assessment, and throwing logs and rocks along the shoreline to prevent erosion was not one of them. Some alternatives were not studied in 1981 because they involved fill, but today the use of fill would be entertained by BCDC in a design concept.

It is premature for the city to conclude what the long-term adaptation plan will be for the southern shoreline before the Sub-Regional Adaptation Planning process has even commenced.

The application needs editing.

Best,
Richard Bangert