### Dear Mayor and City Council Members,

I am writing in support of Richard Bangert's correspondence below and the facts and ask that you take more time to amend your plans and ensure that restoration of habitat is prioritized and strengthened in the CARP beach shoreline adaptation. Richard's comments and edits are below- ditto on the amendments suggested by Richard because I think they balance the orientation of the adaptation efforts. I know it can be difficult to balance recreation with habitat protection but if you take the time, you can achieve both.

#### Where there is will--there is a way,

Sincerely, Pat Lamborn Alameda 33 years resident

March 18, 2025 City Council meeting

Agenda Item 7-C 2025 Climate Action and Resiliency Plan (CARP) Mid-Cycle Update

# Comments submitted by Richard Bangert

Dear Mayor and Councilmembers:

The beach/shoreline adaptation strategy is weak on wildlife habitat in the draft Climate Adaptation and Hazard Mitigation Plan section of the CARP Update. While "Habitat" is listed as a key planning issue, it is not sufficiently incorporated into the narrative.

Therefore, I recommend that the language **on page 143** be amended as follows before sending the Climate Adaptation and Hazard Mitigation Plan to the state's Office of Emergency Services for approval:

1. In the Vulnerability Addressed box, after the sentence beginning with "The vegetated sand dunes along Shoreline Drive provide coastal flood risk reduction ..." add the following sentence: "Rising sea level will compromise the viability of the bird sanctuary marshland ecosystem impacting Bay-wide biodiversity."

2. In the Strategy Summary box, add the words "and also maintaining marshland" so that the sentence reads: "A more permanent solution is needed to mitigate coastal erosion and inland flooding, while also maintaining the beaches, and also maintaining marshland.

3. In the Strategy Summary box, after the sentence beginning with "Alameda's beaches are the most visited ..." add the following sentence: "Elsie Roemer Bird Sanctuary is one of the few remaining salt marsh habitats bordering the Bay, providing food and refuge benefits for migrating and local bird populations."

4. In the Limitations and Barriers box add the following bullet point:

How will marsh habitat be incorporated into the adaptation plans for this shoreline?

5. In the Limitations and Barriers box, the following paragraph is not accurate and should be edited as follows:

"Adaptation strategies that include expanding the beach or marsh into the Bay or into the existing sand beach will encounter permitting challenges related to be looked favorably upon by the Bay Conservation and Development Commission (BCDC) whose policies, which limit allow fill in the Bay to facilitate the adaptation of habitats to rising sea level. The City of Alameda may wish to consider getting should continue being involved in regional conversations encouraging BCDC and the state legislature to re-evaluate these policies address the funding challenges as the Bay adapts to sea level rise."

## RATIONALE FOR SUGGESTED EDITS ON POINT #5:

First, BCDC's policies, in the form of the Bay Plan, have already be re-evaluated in its updated plan to reflect the present-day understanding of impending impacts of sea level rise that were not contemplated in the original plan.

Second, as a result of those changes in policy, it is not clear how the draft CARP comes to the conclusion that adaptation strategies involving fill "will encounter permitting challenges." Language in the current plan suggests just the opposite, that adaptation plans involving fill that provides ecosystem benefits are important and will be welcomed.

The current Bay Plan, under the heading "Justifiable Filling," states: "Restoring, enhancing, or creating ecosystems that provide habitat for native fish, other aquatic organisms, or wildlife; enhance coastal resilience; and provide services such as water filtration, carbon sequestration, protection of shorelines from flooding and erosion, and raising the surface elevation of subsided land. Fill for these purposes will be especially important to facilitate the adaptation of habitats to rising sea level." (Emphasis added.)

The current Bay Plan, under the heading "Effects of Bay Filling," states: "Filling can restore, enhance, or create valuable habitat for native organisms, which can in turn support healthier populations and communities of fish, other aquatic organisms, and wildlife; increase numbers of protected or endangered species; increase habitat connectivity; increase habitat sustainability; and contribute to regional habitat goals. Filling can be used to facilitate sea level rise adaptation of Bay habitats that are vulnerable to drowning

and erosion." (Emphasis added.)

As a side note, the CARP's adaptation narrative for the southern shoreline does not mention the forward-thinking guiding principle for De-Pave Park's master plan – ecological succession, meaning sea level rise planning that is self-adapting to maintain habitat values over time to the best of our ability. The geography of the southern shoreline is different than the geography of De-Pave Park, but the principle is still applicable.

Thank you for considering my last-minute comments,

**Richard Bangert** 

March 18, 2025 City Council meeting

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