

September 1, 2020

District Engineer
U.S. Army Corps of Engineers
Attn: Planning Branch
450 Golden Gate Ave, 4th Floor, Suite 0134
PO Box 36152
San Francisco CA 94102-3406
(415) 503-6708

Dear Sir or Madam:

This letter is to revise the February 2019 request for assistance of the U.S. Army Corps of Engineers (USACE) under Section 206 of the Water Resources Development Act of 1996, as amended, in aquatic ecosystem restoration of wetlands at Wavecrest open space in the City of Half Moon Bay, CA.

Wavecrest, an area of undeveloped bluffs along the City's coastline, consists of a combination of coastal prairie (a mix of grasslands and scrub habitat) and seasonal wetlands. This habitat mosaic supports a large diversity of plants (e.g., Choris' popcornflower¹), insects and animals, including federally-listed threatened and endangered species such as California red-legged frog (*Rana draytonii*) and San Francisco garter snake (*Thamnophis sirtalis tetrataenia*). Furthermore, the Wavecrest bluffs are uniquely important for birds of prey; the local Audubon chapter (Sequoia Audubon Society) considers this area to be the most important habitat for wintering raptors in San Mateo County, as it supports a greater diversity of raptors and number of individuals than any other site.²

Historically the project area, consisting of approximately 150 acres at the north end of the Wavecrest open space, was largely seasonal wetlands. Due to construction of Highway 1 (to the east of the project area) and past water management practices for agriculture, surface waters that previously flowed across the landscape have been channelized into the Seymour Ditch, leaving only remnants of the wetland habitat which are less resilient to variability in annual

¹ Occurrences of Choris' popcornflower (*Plagiobothrys chorisianus* var. *chorisianus*) have been documented at Wavecrest. This plant is identified by the California Native Plant Society (CNPS) as code 1B.2, or "Rare or Endangered in California and elsewhere," and "Fairly Endangered in California (20-80% occurrences Threatened)"

² Sequoia Chapter Audubon Society. 2008. Sequoia Needles. Bulletin of the Sequoia Audubon Society, San Mateo County. Volume 59, No. 2. November-January 2008-2009.

rainfall. For example, places where seasonal ponds form are cut off from surface water flow, and rainfall is insufficient for the ponds to persist and serve as habitat for aquatic species. The drier conditions in the wetlands and surrounding grasslands have also facilitated invasions of woody vegetation (e.g., coyote brush and Monterey cypress) which are rapidly converting these habitats to coastal scrub and woodland. With loss of wetland, the Wavecrest area is becoming less suitable for supporting species such as the California vole (*Microtus californicus*), California red-legged frog and Pacific tree frog (*Pseudacris regilla*) that are key food sources for birds of prey, snakes and other predators. Additionally, raptors hunt voles – a mainstay of their diet at Wavecrest – by detecting their urine trails which are obscured by too much shrub cover. Essentially, wetland habitat serves as a lynch pin for creating the conditions that support the diversity and density of species at Wavecrest, and enhancing the wetlands in the project area would benefit overall ecosystem health by maintaining a more optimal mix, or mosaic, of habitats across the landscape.

In addition to depriving these habitat areas of water, channelization in the Seymour Ditch has contributed to significant erosion at the cliff edge where the ditch releases water into the ocean at Poplar Beach. This erosion is undermining the Seymour Bridge (owned by the City of Half Moon Bay) which crosses the ditch at this point and connects the heavily-used California Coastal Trail onto Wavecrest. Just upstream of this discharge point, the ditch is downcutting, and if not addressed this erosion could eventually expose the closed (and capped) landfill (owned by the County of San Mateo) located approximately 30 feet to the north of the ditch.

The vision for this project is a multi-benefit aquatic restoration that enhances the quantity and quality of these seasonal wetlands to support aquatic species such as California red-legged frog and Pacific tree frog; contributes to the overall mosaic of coastal prairie and wetland habitat across Wavecrest to support large and diverse populations of raptors and other species; and reduces flows in Seymour Ditch to address the associated, downstream erosion issues. Through a series of discussions and site visits, the landowners, (City of Half Moon Bay, Peninsula Open Space Trust (POST) and Coastside Land Trust (CLT)) have explored the opportunity to utilize the stormwater for restoration, and identified key issues and constraints that will affect the feasibility of project designs. Fundamental questions about suitability of sites within the project area and the stormwater for aquatic habitat restoration need to be evaluated and addressed. Maintaining access in the project area creates additional design constraints (e.g., maintenance access to sewer and water pipelines that bisect the project area; and public access for walking and biking). These issues and constraints present significant challenges to the landowners in assessing feasibility of, and designing a project that achieves the restoration goals, Section 206 assistance is being sought because of the USACE planning staff's multi-disciplinary expertise, and their experience with exactly these types of complex aquatic restoration projects.

As the local sponsor under the Section 206 program, the San Mateo Resource Conservation District (RCD) recognizes that under the feasibility phase of the project the local sponsor is responsible for 50 percent of feasibility study costs exceeding \$100,000 in Federal expenditures and 35 percent of project design and construction costs, if a feasible plan is identified. The RCD acknowledges that the cost share contribution can be in the form of "in-kind" services that

contribute a direct component to the study, cash or a combination. The cost share obligation would include provision of all lands, easements, rights-of-way, relocations, and dredged material disposal areas required for the project. The RCD anticipates entering into sub-agreements with the landowners to enable us to provide funds and in-kind services to meet cost sharing requirements. Operation and maintenance of the project upon completion will be the responsibility of the landowners.

The RCD has designated Sara Polgar (sara@sanmateorcd.org) as the point of contact, and we are excited to work with the USACE team, City of Half Moon Bay, POST and CLT on this project.

Sincerely,

Kellyx Nelson

[Kellyx Nelson \(Sep 3, 2020 16:50 PDT\)](#)

Kellyx Nelson
Executive Director

CC: Thomas Kendall, Program Manager, Regional Continuing Authorities Program (CAP)

Wavecrest: ACOE letter for signature

Final Audit Report

2020-09-03

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