



October 15, 2014

Jolie Harrison, Chief
Permits and Conservation Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway, Silver Spring, MD 20910
itp.guan@noaa.gov

Re: San Francisco Bay Area Water Emergency Transportation Authority (WETA) Central Bay Operations and Maintenance Facility Project in Alameda, CA

Dear Chief Jolie Harrison,

The Sierra Club's mission includes protection of the natural environment and ecosystems.

The plan for the Central Bay Operations and Maintenance Facility in Alameda, California, will have a profound impact on the Pacific harbor seals that have been using the Alameda Point Channel and Inner Harbor for feeding, hauling out, and even delivering pups. The full impact of WETA's ferry maintenance facility project on the marine ecosystem and one of its most prominent inhabitants, the harbor seals, have not been adequately addressed in the Incidental Harassment Authorization Level B permit application by WETA.

Following the end of Navy operations at Naval Air Station-Alameda in 1997, the Navy's recreational boating dock located at the WETA project site for the proposed ferry maintenance facility fell into disrepair. The coincidental lack of maintenance and lack of human presence on the docks was ultimately fortuitous for the harbor seals that frequent the protected waterway. The dock itself, along with odd wooden structural debris that lodged against the dock, became an easy and inviting haul out for the seals. During the spring of 2014 at least one pup was reared at the WETA project site. One local observer has suggested that there may have been two pups reared at the site in 2014.


Beside the calm waters and absence of boating commotion, food sources for the harbor seals are in supply in the Alameda Point Channel, and also in the Inner Harbor where the WETA project site is located. Bat rays migrate into the channel and harbor, and at least one encounter between a harbor seal and bat ray was captured on video this year <https://vimeo.com/95702921>.

Shoreline development is one of the primary reasons for harbor seal abandonment of San Francisco Bay. When haul-out sites are disturbed by nearby development or regular human presence, the seals are prone to depart for safer surroundings. In the case of the WETA ferry facility project, it is not a traditional natural shoreline that will be disturbed or destroyed. But the dock has become a relied-upon haul out nonetheless. Its demolition and replacement with an active berthing facility for 11 ferries will leave the harbor seals little choice but to look elsewhere for a haul out.

The Sierra Club recommends that the National Marine Fisheries Service impose additional mitigation measures on the project to compensate for the loss of harbor seal habitat—namely, the old recreational dock. Given the geography of the Alameda Point Channel and Inner Harbor, a new haul-out dock nearby, possibly an anchored floating dock, should be evaluated as a mitigation measure to help retain the colony of harbor seals that find respite along Alameda Point's shore. Maintaining a welcome habitat for the harbor seals will not only benefit the harbor seals themselves; their presence within easy eyesight of shoreline visitors will offer a unique ongoing educational encounter with this reclusive marine mammal.

The permit application is incomplete in that it does not identify loss of habitat as a consequence of the project. We request further assessment of the project's impact on the harbor seals.

Respectfully yours,



Michael Brune
Executive Director, Sierra Club

Sierra Club, Northern Alameda County Group, San Francisco Bay Chapter