

September 22, 2015

Menlo Park Parks and Recreation Commission 701 Laurel St. Menlo Park, CA 94025

Re: Drone and RC Aircraft Use at Bedwell-Bayfront Park

Dear Chair Palefsky and Commissioners,

The Committee for Green Foothills urges you to recommend to the City Council that they consider a ban on the use of drones and remote-controlled aircraft (collectively, "Unmanned Aircraft System" or UAS) at Bedwell-Bayfront Park. The Committee for Green Foothills is a non-profit organization working to protect open space and natural resources in San Mateo and Santa Clara Counties.

The Master Plan for Bedwell-Bayfront Park states that the park should be "a hilly, bayview, regional park with natural groundcover, wildlife enhancement and passive use, providing public access to the Bay and an opportunity for people to enjoy peace and quiet." (See attached flyer from Friends of Bayfront Park, quoting Bayfront Park Master Plan.) To the extent that use of UAS disturbs the peace and quiet of Bedwell-Bayfront Park, this is contrary to the stated purpose of the park.

Bedwell-Bayfront Park is almost completely surrounded by marshland, salt ponds and sloughs, all of which harbor waterfowl and shorebirds, including threatened and endangered species such as Ridgway's Rail (formerly California Clapper Rail) and Western Snowy Plover. To the south, east and north, the Ravenswood salt ponds and Greco Island form part of the Don Edwards National Wildlife Refuge, and the Ravenswood salt ponds are in the process of restoration under the South Bay Salt Pond Restoration Project. Takeoff and landing of UAS is prohibited on federal Refuge lands due to the potential for harassment of wildlife. While Bedwell-Bayfront Park is not itself within Refuge boundaries, the City of Menlo Park, as a good neighbor to the Refuge, should take into account the fact that Refuge regulations consider UAS operations to be potentially harmful to the wildlife in the Refuge.

There are several parks and designated open space areas where UAS activities are specifically encouraged, including Rancho San Antonio Preserve in Cupertino, which has specific guidelines addressing the extent and conditions under which UAS operations may occur. UAS use at Bedwell-Bayfront Park is currently entirely unregulated and is not within the scope of activities that were originally considered for the park. Should the City decide to allow UAS use as a permitted use within Bedwell-Bayfront Park, this would be outside the scope of the environmental impacts that were analyzed in the EIR for the Master Plan. Because of the potential for significant environmental impacts, including impacts to the endangered and threatened wildlife in the Don Edwards Wildlife Refuge, allowing UAS use in Bedwell-Bayfront Park would require CEQA/NEPA compliance.

We urge you to recommend that the City Council consider regulating or banning the use of UAS in Bedwell-Bayfront Park. Thank you for your consideration of these comments.

Sincerely,

Alice Kaufman

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Legislative Advocate, Committee for Green Foothills