

Law Offices of
Stuart M. Flashman
5626 Ocean View Drive
Oakland, CA 94618-1533
(510) 652-5373 (voice & FAX)
E-mail: stu@stuflash.com

July 14, 2021

MTC Public Information
Attn: Draft EIR Comments
375 Beale Street, Suite 800
San Francisco, CA, 94105

Re: Draft Environmental Impact Report for Plan Bay Area 2050.

Dear Staff, MTC Commissioners, and ABAG Representatives:

On behalf of my client, the Citizens Committee to Complete the Refuge, I request that ABAG/MTC extend the review and comment period for the above-referenced draft environmental impact report ("DEIR") for an additional one month period. My client is an all-volunteer public interest 501(c)(3) nonprofit organization dedicated to maintaining, protecting, improving, and expanding the Don Edwards National Wildlife Refuge ("Refuge") within the San Francisco Bay.

Because Plan Bay Area 2050 proposes to expand the development of shoreline areas within San Francisco Bay, and particularly to construct protective projects aimed at sea level rise, it has the potential to seriously and adversely impact the Refuge, the sensitive shoreline and wetland habitat contained within the Refuge, and the many plant and wildlife species, including protected species, that depend on that habitat for their continued survival. Consequently, my client has needed to carefully study the voluminous materials associated with the DEIR to identify deficiencies in its analysis. Unfortunately, there are many. Just to mention one major deficiency, the DEIR gives only slight passing mention to the federally and state protected and endangered salt marsh harvest mouse, which inhabits wetlands that would be put at risk by some of the projects contemplated in Plan Bay Area 2050.

While my client has been working diligently to review the more than 2,300 pages of complex materials, including technical reports, associated with the DEIR, it has become apparent that its volunteers cannot complete the necessary review of the DEIR and provide their full comments before the current July 20th deadline for comment submission. Consequently, my client requests that ABAG and MTC extend the comment period so that it and other public interest groups can provide the detailed and thoughtful evaluation and comments that this DEIR needs and deserves.

My client would respectfully request a one-month extension to the comment period. If that is not possible, then a three week extension would be acceptable, although not ideal. However, even a two-week extension, while less than adequate, would be helpful.

Most sincerely



cc: MTC, ABAG