



B A S M A A

Alameda Countywide
Clean Water Program

Contra Costa
Clean Water Program

Fairfield-Suisun
Urban Runoff
Management Program

Marin County
Stormwater Pollution
Prevention Program

Napa County
Stormwater Pollution
Prevention Program

San Mateo Countywide
Water Pollution
Prevention Program

Santa Clara Valley
Urban Runoff Pollution
Prevention Program

Sonoma County
Water Agency

Vallejo Sanitation
and Flood
Control District

June 1, 2017

Metropolitan Transportation Commission (MTC)
Association of Bay Area Governments (ABAG)

Subject: Comments on Draft Plan Bay Area 2040

MTC-ABAG:

On behalf of the Bay Area Stormwater Management Agencies Association (BASMAA), thank you for the opportunity to provide comments on Draft Plan Bay Area 2040. BASMAA is a 501(c)(3) non-profit organization comprised of the municipal stormwater programs in the San Francisco Bay Area representing 100 agencies, including 85 cities and towns, 8 counties, and 7 special districts. BASMAA focuses on regional challenges and opportunities to improve the quality of stormwater flowing to our local creeks, the Delta, San Francisco Bay, and the Pacific Ocean.

We are focusing our comments on the Resilience portion of the Action Plan.

New Resilience Action

First and foremost we recommend that Plan Bay Area 2040 include a wholly new Resilience Action:

Shift the focus on Complete Streets to Sustainable Streets: Move communities from the current focus on Complete Streets that address active transportation issues to Sustainable Streets that also incorporate green infrastructure for stormwater management – thereby reducing runoff from urbanized areas, mitigating flooding, improving water quality, recharging groundwater, reducing urban heat island impacts, improving aesthetics, reducing greenhouse gas emissions, and mitigating the effects of climate change.

Partners: BARC, MTC/ABAG, RWQCB, Caltrans, local jurisdictions
Timeline: 1- 4 Years

The new Resilience Action would take advantage of the many natural linkages between stormwater quality management, transportation planning, greenhouse gas reductions, and climate change mitigation strategies. It would also build on the ABAG / San Francisco Estuary Partnership *Urban Greening Bay Area* project (<http://www.sfestuary.org/our-projects/water-quality-improvement/greenplanning/>). *Urban Greening Bay Area* includes a Regional Roundtable series of working meetings where local, regional, state, and federal agencies, elected / appointed officials, and private sector and non-profit partners are developing policy solutions to integrate transportation, climate, and water quality investments.

Other Comments

Significant green infrastructure implementation is required by the Regional Water Quality Control Board throughout much of the Bay Area to achieve long-term water quality improvement in San Francisco Bay, and these projects will directly benefit climate change adaptation efforts. The Resilience Action Plan should build on and coordinate with those efforts.

Bay Area

Stormwater Management

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BASMAA recommends the Resilience Action Plan define resilience to include management of stormwater runoff to address flooding and water quality concerns. The Action Plan should specifically reference stormwater management and green infrastructure implementation. Municipalities are doing significant work on stormwater planning and management, including developing countywide stormwater resource plans and local green infrastructure plans that will help with flood control, groundwater recharge, and water quality improvement.

The Resilience Action Plan should consider inclusion of the Regional Water Quality Control Board as a partner along with local agencies and stormwater and flood control agencies and associations.

The Resilience Action Plan should also recognize, coordinate with, and build on the Comprehensive Conservation and Management Plan for San Francisco Bay (the Estuary Blueprint) and include the San Francisco Estuary Partnership as a partner. In addition:

1) Under "Develop a regional governance strategy for climate adaptation projects," change language to not be specific to sea level rise, but keep more broad as climate change adaptation. Climate change impacts may be experienced sooner in the context of more intense precipitation events, so regional governance is also applicable to addressing managing climate change-induced flooding that may not be directly related to sea level rise. Heat island issues are another example. Adaptation overall in the Bay Area requires a regional governance strategy.

2) Under "Expand the region's network of natural infrastructure," revise to include language specific to improving water quality, recharging groundwater, and reducing urban heat islands. Leverage existing initiatives should also include countywide stormwater resource and green infrastructure planning.

3) Under "Establish the Regional Advance Mitigation Program," this should include improving water quality in addition to regional biological conservation priorities. Infrastructure projects will require stormwater management actions, and advance mitigation programs should work with local agencies to identify locations for green infrastructure implementation to mitigate water quality impacts of infrastructure projects.

Thank you again for the opportunity to comment. If you have any questions, please contact me at 650-599-1419 or our Executive Director, Geoff Brosseau at 650-365-8620.

Sincerely,



Matt Fabry, Chair
Bay Area Stormwater Management Agencies Association

cc: Bruce Wolfe, Executive Officer, San Francisco Bay Regional Water Board
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Keith Lichten, Watershed Management, San Francisco Bay Regional Water Board
BASMAA Board of Directors