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*Chief Executive Officer*

June 1, 2017

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VIA EMAIL

**Bay Planning Coalition Comment Letter – Plan Bay Area 2040 Draft Plan**

To Whom It May Concern:

Bay Planning Coalition (BPC) writes to provide several comments regarding the Plan Bay Area 2040 Draft Plan (“the Plan”) released in March 2017.

BPC is a nonprofit, member organization that advocates for sustainable commerce, industry, infrastructure, recreation and the natural environment connected to the San Francisco Bay and its watershed. Together with our nearly 150 member organizations, we work diligently to ensure, among other things, that land on the Bay is used wisely and developed in economically and environmentally sound ways.

After reviewing the Plan, we have the following feedback to provide. We are providing our feedback in the order that the applicable language appears in the Plan and the page numbers that we cite are drawn from the version of the plan posted online at <http://2040.planbayarea.org/>.

- While we do not actively engage in housing policy, we applaud your identification of the California Environmental Quality Act (CEQA) as a barrier to the development of sufficient housing supply (p.9). Still, we do believe that the Plan needs to do more to address the opposition there will be from the “NIMBY” community to many of the housing solutions, including strategies for improved communication with groups that regularly oppose new housing.
- Although we fully support Caltrain electrification (p. 48-49), we question why the Plan does not propose electrification of other rail transit methods as well. Specifically, if BART were also “electrified” – particularly in the areas where it plans to expand its reach – would it not also result in the same benefits of increased efficiency, reduced greenhouse gas emissions, and improved air quality?
- Goods movement and increasing its effectiveness in the Bay Area is critical to our regional economy. Accordingly, we believe a more intensive cost-benefit analysis needs to be done regarding the proposed spending in this area of the Plan (starting at p. 58). Some of the items spending is assigned for could result in an amount of economic growth and revenue (due to increased efficiency or other benefits) that makes it worth investing more in them than in some of the other items listed. The increased tax (and other types of) revenue would further enhance the economic vitality of our region.
- Regarding greenhouse gas emissions (p. 60), we feel that it would be beneficial for the goals and strategies in the plan to align more directly with those proposed in the Bay Area Air Quality Management District’s plans and efforts. It is difficult for the public and business community to monitor and engage with

air quality plans from multiple regional agencies that don't seem symmetrical.

- We are very glad to see resilience included as part of the Action Plan (p. 77). We believe that more can be said in the plan about the importance of protecting utilities and other infrastructure from the threat of sea level rise, and the importance of the Metropolitan Transportation Commission coordinating their plan for doing that with others that are being developed.
- Additionally, we agree that a regional governance strategy for climate adaptation projects (p. 78) is needed and believe that BPC, as a representative and partner of many of the stakeholders who would be involved in such an effort, has a great deal to contribute to the process of developing one. In fact, at our Spring Summit event in May, we polled the audience of nearly 200 people about a related topic and think you might find the results of interest:

***If you had to choose one entity to direct regional sea level rise preparedness, which would it be?***

- **The Bay Conservation and Development Commission: 36%**
  - **A new regional agency specifically created to address sea level rise in the Bay Area: 36%**
  - **The Association of Bay Area Governments: 11%**
  - **The U.S. Army Corps of Engineers: 11%**
  - **The San Francisco Restoration Authority: 5%**
  - **The Metropolitan Transportation Commission: 2%**
- Also regarding resilience, we think that a critical part of any successful regional effort to combat sea level rise will be securing stable state funding for dredging and beneficial reuse. While BPC is a supporter of AB 388, which seeks to secure "cap and trade" funds for beneficial reuse, we believe that a more stable source of funding is needed and that it should also specifically finance dredging. We are currently working to secure state funding for a study on the economic and environmental benefits of dredging and beneficial reuse, and we believe it will show very clearly what a smart public policy decision it would be to include these activities in the state's budget moving forward. Dredging and beneficial reuse are key to the Plan's stated goal of expanding the region's network of natural infrastructure (p. 78), as well as to the overall quality of the region's air – shipping routes that are not effectively dredged lead to "light loading" of ships and increased ship traffic; and without sufficient dredged material, beneficial reuse and many resilience-related projects simply aren't possible.

In conclusion, we appreciate the opportunity to comment on the Plan and hope to participate in the process of implementing it. We would also like to participate in the scoping of the next iteration of Plan Bay Area, which we understand will start soon. Please let us know how we can be of the best assistance moving forward.

Sincerely,



John A. Coleman  
Chief Executive Officer