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May 24, 2017

Jake Mackenzie, Chair
Metropolitan Transportation Commission
Julie Pierce, President
Association of Bay Area Governments
Bay Area Metro Center
375 Beale Street
San Francisco, CA 94105

RE: Draft Plan Bay Area 2040

Dear MTC Chair Mackenzie, ABAG President Pierce, and Commissioners:

Thank you for the opportunity to comment on the Draft Plan Bay Area 2040. The East Bay Regional Park District owns and manages over 120,000 acres of open space and active transportation trails in both Contra Costa and Alameda Counties including over 55 miles of shoreline. In doing so, the District provides a substantial contribution to the quality of life in the East San Francisco Bay, and our 200 miles of paved trails provide important regional transportation connections, including trails that parallel Interstate-80 and -680 and provide first- and last-mile connections to transit.

District lands and shorelines provide significant ecosystem services and provide the first line of defense against sea level rise that protect East Bay businesses, homes, and infrastructure. A recent economic study completed by Economic and Planning Systems, Inc., estimates the value of the ecosystem services provided by the District at \$517 million annually. These lands and shorelines will become increasingly important as the region experiences the increased impacts of sea level rise and extreme storm events.

Responding to the challenges of sea level rise and extreme storm events to protect the region's transportation infrastructure will require significant investment in restoration and adaptation projects. The Bay Area Council estimates that \$46.2 billion in structures and contents are located within a 100-year flood plain throughout the Bay Area. In the East Bay, many of these flood plains and shorelines are owned and managed by the East Bay Regional Park District.

Plan Bay Area needs to provide a bold vision for addressing the need to protect the region's infrastructure with specific measures for implementation. Following are recommendations that would help the East Bay respond to the climate change impacts that we are currently experiencing along the 55 miles of shorelines and within the 65 regional parks that we steward:

- The proposed regional strategy for climate adaptation projects needs to include special districts, such as the Park District, that own and manage land. This strategy should be linked to the creation of new funding sources for adaptation and resilience. The strategy should function as a funding framework similar to a transportation expenditure plan.

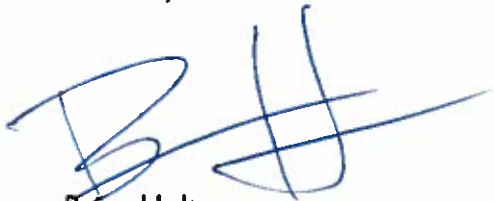
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- Include an integrated permitting strategy for climate smart infrastructure that achieve sPlan Bay Area 2040 goals and objectives in an effort to allow a coordinated permitting process that avoids unnecessary delays.
- The District is working to expand the region's network of natural infrastructure through partnering on initiatives such as Priority Conservation Areas, the Resilient by Design Challenge, San Francisco Estuary Partnership, and the Bay Restoration Authority. MTC should partner with the District to pursue new funding opportunities for climate smart infrastructure to protect against flooding. The District is a regional leader in natural infrastructure and our expertise in environmental permitting, restoration, and management can be a key asset in implementing the goals of Plan Bay Area.
- The Regional Advance Mitigation Plan should be expanded to development projects to create greater certainty for both the development and environmental communities and eventually be expanded to include regional carbon off-sets that could invest in open spaces that store carbon.

We appreciate the opportunity to provide our comments, and please feel free to contact us if you have any questions or would like additional information.

Sincerely,



Brian Holt
Principal Planner
Advance Planning

Cc: Erich Phuehler – Government Affairs Manager
Sandra Hamlat – Senior Planner