

Subject: Comments on the San Francisco Bay Coastal Management Program Draft Assessment and Strategy 2021 to 2025 Enhancement Cycle

Date: Thursday, August 13, 2020 at 4:08:09 PM Pacific Daylight Time

From: Lee Huo

To: Hall, Megan@BCDC

Megan,

Thank you for the opportunity to review the San Francisco Bay Coastal Management Program Draft Assessment and Strategy 2021 to 2025 Enhancement Cycle. Below are the comments from the San Francisco Bay Trail Project.

- 1) The Bay Trail Project appreciates the report's acknowledgment in the previous accomplishments section that BCDC has worked with the Bay Trail Project to implement the planned continuous Bay Trail alignment. In the Assessments section starting on page 35 and in proposed the Strategies sections, the public access objective and discussion needs to incorporate language that commits to continuing to work towards implementing the Bay Trail and ensuring its continuity and connectivity consistent with the goals of the Bay Trail.
- 2) We also strongly believe that Public Access should be identified as a High Priority in the Assessments section due to the conflicts that the Assessment discusses between public access and wildlife/restoration projects. The perceived conflict by some resource organizations of public access and wildlife/restoration projects has hindered the implementation of several Bay Trail segments. If the goals established for BCDC in this Draft Assessment and Strategy include prioritizing wetland restoration and sea level retreat as the highest priority, public access and meeting the goals of implementing the Bay Trail vision of a continuous and connected trail system must be a part of that conversation and continue to be a goal for BCDC. Without equal consideration of both the goals of wildlife/restoration goals and Bay Trail/public access goals, those conflicts will continue and possibly threaten the ability to achieve the vision of the Bay Trail as a continuous shoreline trail circling San Francisco Bay. The success of the Bay Trail vision is contingent on the ability to ensure a connected and continuous Bay Trail alignment throughout the 9-county range of the Bay Trail system. In the face of sea level rise, the Bay Trail is as equally vulnerable as the habitat and wetlands in the Bay. In addition, during the current Covid-19 pandemic, the need and value for high quality public access and trails like the Bay Trail has been shown to be invaluable for physical, emotional, and mental health.
- 3) Similarly, we are concerned with the characterization in the Comments Summary section on Page 99 of the wildlife/habitat and public access conflicts and the need for regional public access planning as being "slightly lower priority issues". We believe these public access issues are a high priority for the reasons described in the previous comments.
- 4) It's unclear if there's a difference in prioritization of Strategy 1 vs Strategy 2 and of the Phase 1 Assessments and Strategies and the Phase II Assessments and Strategies. Since public access and wildlife/wetlands are identified in different strategies and Phases, we would emphasize the need to equally prioritize the goals for these two different categories.
- 5) We would also like to verify a few numbers included on Table 7 in the public access assessment section on Page 35. There are currently 50 designated Water Trail sites. For the Bay Trail, we want confirm that the 10 additional miles of Bay Trail identified in the table includes the newly completed Bay Trail on the Richmond-San Rafael Bridge and its approach (6 miles), the recently opened Albany

Beach Bay Trail (1 mile) and the newly opened Ravenswood Bay Trail (0.6 miles).

Please let me know if you have any questions related to these comments, and the Bay Trail Project is looking forward to continuing our partnership with BCDC and working towards the implementation of the Bay Trail.

Sincerely,

Lee Chien Huo
Bay Trail Planner
San Francisco Bay Trail Project
375 Beale Street, Suite 700
San Francisco, CA 94105-2066

Tel: (415) 820-7915
lhuc@bayareametro.gov
www.baytrail.org

Subject: NOAA Section 309 Draft Assessment and Strategy
Date: Friday, August 14, 2020 at 9:22:29 AM Pacific Daylight Time
From: Pemberton, Sheri@SLC
To: Hall, Megan@BCDC
Attachments: image001.png, image002.png, image003.png

Hi Megan –

Below are comments from the California State Lands Commission regarding the NOAA Section 309 Draft Assessment and Strategy. Please let me know if you have any questions or would like additional information.

State Lands Commission Comments:

General Comments

1. In the ‘Summary of Recent Achievements’ section, consider adding a table to present a depiction of the summary. This will make it easier for the reader to reference when going through the Assessment and Strategy sections.
2. In the Summary of Stakeholder and Public Comment (p.97), none of the self-identified stakeholders listed Tribal membership as an affiliation. The State Lands Commission recommends conducting additional outreach to Bay Area Tribes before finalizing the NOAA Section 309 Draft Assessment and Strategy.

Phase II Assessment

1. Wetlands (p.65): Sea-level rise threatens the survival of existing wetlands and those that will be restored or created in the future. Sea-level rise coupled with existing and planned shoreline development results in a coastal squeeze effect on wetlands, identified as ‘Stressor 3: Lack of wetlands migration space’ from Table 30 (p.65). We recommend inclusion of a management priority that targets this stressor. The priority could direct BCDC to partner with the regional transportation authority, the nine counties, and the shoreline cities and communities to develop and implement policies aimed at alleviating space limitation so that wetlands can migrate vertically and horizontally landward as sea level rises.
2. Coastal Hazards (p.72): We recommend expanding the discussion of how intergovernmental coordination and partnership can strengthen strategic planning and implementation of policies and actions to mitigate and reduce coastal hazards.

Strategies

1. Strategy 1 - Improve the Region’s Capacity to Understand and Adapt to Current and Future Coastal Hazards Risks (p.87): We strongly support this strategy, particularly the emphasis on strengthening comprehensive planning, policy, and project implementation through enhanced coordination with regional and local governments. The State Lands Commission partners with BCDC on many agency working groups involving the use of dredged material and sediment management within the Bay. This strategy includes actions to facilitate the beneficial use of dredged sediment or other materials in habitat restoration (San Francisco Bay Plan, Fill for Habitat Bay Plan amendment). The State Lands Commission looks forward to coordinating with BCDC to improve the permitting process. One concern with the Fill for Habitat Bay Plan amendment may be the types

of materials that are proposed for use on State-owned sovereign land.

2. Strategy 2 – Improve Coastal Management Related to Water-Oriented Uses (p. 92): Balancing competing Public Trust uses (water-oriented and water-related) is complex and legally nuanced. The State Lands Commission sees many opportunities to work in partnership with BCDC on the issues identified in the Phase I and II Assessments, and here in this strategy. We look forward to collaborating to implement this strategy in areas of the Bay where we share jurisdiction over submerged and tidal lands.

-Sheri

Sheri Pemberton, Chief, External Affairs & Legislative Liaison

CALIFORNIA STATE LANDS COMMISSION

100 Howe Avenue, Suite 100-South | Sacramento | CA 95825

Phone: 916.574.1800 | Email: sheri.pemberton@slc.ca.gov



Subject: Public Comment on Draft Assessment and Strategy for the 2021 to 2025 Enhancement Cycle
Date: Friday, August 14, 2020 at 12:24:50 PM Pacific Daylight Time
From: Rich Jepsen
To: Hall, Megan@BCDC

Ms. Hall;

My name is Richard Jepsen, a Bay Area resident, retired owner of a sail training and rental/charter school and the current vice president of US Sailing.

I wish to bring to your attention criteria for your assessment that appears to be missing.

As the purpose of the public access section is to provide/ensure/protect quality public access to this public jewel, San Francisco Bay, the actual usage of boats on the Bay does not appear to have been considered. Observations of marinas around the Bay Area over my forty years as a sailing business owner and sailor myself shows that the vast majority of boats sitting in marina slips around the Bay do not move for years. It is a sad aspect of boat ownership that it doesn't appear to prompt use of the Bay except for a very few avid boaters. The Division of Boating and Waterways has statistics, but our observational data shows that in marinas around the Bay, on the busiest boating days of the year (Opening Day, July 4, Blue Angels Demonstrations) only about 10% of the SF Bay marina berths are empty on those days. On normal summer days that number drops to less than 5%.

Quantifying 'public access' as measured by the # and length of slips built is convenient but does not measure the right thing. It does provide a useful tool for marina developers to justify more slips and more marina projects, but that isn't the point of the effort, right?

Programs like Treasure Island Sailing Center, Alameda Community Sailing Center, OCSC Sailing, Club Nautique, Modern Sailing Academy, Tradewinds Sailing, San Francisco Sailing Company, SEA – San Rafael, Freedom Boat Club as well as several private clubs with club owned boats available to members, are providing thousands of citizens safe access to the water and are the only segment of boating that is growing. These organizations train citizens on safe boating then provide them access to boating with the boats in its inventory. Easily 50% of the boats seen on San Francisco Bay each weekend day in the summer are from these programs. The percentages in the winter are even higher, as the boaters in those organizations tend to be more active because the process of using a club boat is so much easier and more convenient than ownership.

I propose the following:

1. Once Bay Area boating life is closer to normal do some observational science on the most popular marinas around the Bay Area and count the number of boats in active use out of those marinas. You will confirm my assertions, above, that public access is not being measured fully.
2. Specifically measure the number of Bay Area citizens who gain access to San Francisco Bay and the estuarial region through organizations, for profit and not for profit, who provide access through shared use of equipment.
3. Consider a survey of all programs who provide equipment to their clients/members to gain data on how many citizens are served by a fleet of shared boats in a very few slips around the Bay Area. Your eyes will be opened.

As a leader of the national governing body of the sport of sailing and a local businessman, I'm willing to volunteer to help you sort this proposed action if you need it.

Sincerely,

Richard Jepsen

Alameda, CA

510 504 9077

Subject: Comment on BCDC draft Coastal Program Management Assessment and Strategy for Commission hearing August 20
Date: Friday, August 14, 2020 at 3:08:09 PM Pacific Daylight Time
From: Hunter Cutting
To: Goldzband, Larry@BCDC, Hall, Megan@BCDC
CC: Jim McGrath, Aaron Peskin, Supervisor Catherine Stefani, Catherine Stefani (sfgov.org), Lee Hepner
Attachments: Factors Driving Growth in US Sailing Participation-160511[2].pdf

Dear Larry Goldzband and Megan Hall:

Please accept this comment below (along with the documentation attached) on the “San Francisco Bay Coastal Program Management Draft Assessment and Strategy for the 2021-2025 Enhancement Cycle,” as presented in your memo of July 10 to the BCDC Commissioners: Staff Report on NOAA Section 309 Draft Assessment and Strategy for commission consideration on August 20, 2020.

Thank you for the work that has gone into this document. Your dedication to the Bay is very much appreciated. Below I highlight areas for continued development of the Assessment and Strategy.

Within the draft Assessment, the strategy to **“Improve Coastal Management Related to Water-Oriented Uses”** is poorly scoped and severely unbalanced. As such major modifications are required to provide a balanced view of recreational boating on the San Francisco Bay.

The strategy for improving the management of water-oriented use is inappropriately framed around marina capacity and ignores the main drivers of the growth in recreational boating across the United States and the Bay Area: community sailing centers and boat-sharing programs.

Marina capacity is extremely poorly correlated with trends in water-oriented use of the San Francisco Bay. Other metrics such as the capacity of community sailing programs and boat share programs are much better correlated with current trends in water-oriented use of the San Francisco Bay.

The scoping of the strategy and in particular the discussion of “recreational boat access” is inappropriately dominated almost exclusively by discussion of marinas and by discussion of “demand” for large marina slips. There is no discussion of community sailing centers or boat share programs. The Draft Assessment inappropriately correlates marina capacity with water-oriented use of the San Francisco Bay, often making an explicit equation between the two.

Marinas all around the Bay are almost exclusively for boat parking, not for accessing the Bay. On any given summer weekend, the vast majority of marina boats remained parked in marinas.

The demand for large marina slips also correlates extremely poorly with water-oriented use of the San Francisco Bay. Most marina boats are semi-permanently parked on the Bay. The “parking” rate for large boats is even higher than the average marina “parking” rate. Large boat slips are essentially long-term storage for large boats. The provision of these slips is very poorly correlated with water-oriented use of the Bay.

Further, the Assessment discussion of the demand for large slips does not acknowledge the extremely

uneven nature of that demand around the Bay.

Sailboat unit sales nationwide are down 65% in last 20 years. CA registrations are down 20% in last 10 years for pleasure craft as well as sailboats. Yet, the number of active US sailors is up, due to the growing the number of registered sailing & aquatic centers. 62 here in California alone. Nationally, There has been a massive growth in both commercial sailing centers (over 500 today up from just 20 in 1975) as well as not-for-profit sailing centers (1,000 today and growing).

Last year the Treasure Island Sailing Center (TISC), for example, served over 4,000 children, youth and adults. And that Center is just one of many community boating centers here in the Bay area. On one recent April Opening Day over 700 visitors showed up at TISC for free sailing, paddling and playing on Clipper Cove. On that same day just 4 boats came out from the 108 slip marina located in Clipper Cove.

Programs like Treasure Island Sailing Center, San Francisco Sailing League, Alameda Community Sailing Center, OCSC Sailing, Club Nautique, Modern Sailing Academy, Tradewinds Sailing, San Francisco Sailing Company, SEA – San Rafael, Freedom Boat Club are providing thousands of citizens safe access to the water and are the only segment of boating that is growing.

These organizations use a sharing model to serve a large number of sailors with a small number of boats. Like Uber or Bike Share – one car or bike for many riders, rather than a single dedicated resource for each rider. And their rapid growth is consistent with what we all know about next generation sailors across the US. They want to go sailing, they don't want to own boats. And they want to do this with their friends, sometimes on the spur of the moment. The socialization component is important.

The future of recreational sailing on the Bay is with community sailing, either community sailing and aquatic centers like TISC or commercial sailing schools.

See attached documentation.

Examples of the unbalanced discussion and analysis in the Draft Assessment include:

- **Table 22** inappropriately equates changes in marina demand with an increase in the threat to recreational boating.
- **Table 23** inappropriately equates marinas with boating on the San Francisco Bay
- The discussion under the section **Changing Marinas and Equitable Access** inappropriately equates small boat ownership with small boat operations on the Bay. This exclusive focus on boat ownership excludes and ignores the huge growth in boat sharing programs as well as operations like community sailing centers. Owning and parking a boat is no longer the driving dynamic of boating on the San Francisco Bay. The shift in demand to large slips does not correlate to a shift to large boats on the Bay.
- The discussion under the section **Changing Recreational Boating Needs** again inappropriately focuses exclusively on changes in marina demand. The failure to discuss the huge increase in water-oriented use of the Bay through boat sharing programs and community sailing center is a glaring omission.

- The proposed “**Management Priority 2: Addressing changing needs for recreational boating in the Bay**” is exclusively focused on marinas. Given the major changes in boating outside of marinas this exclusive focus on marinas is unbalanced and entirely inappropriate.
- The detail on the “need/gap to be addressed by research”, in **Table 43 (Priority Needs and Information Gaps in Managing Coastal and Estuarine Resources)** inappropriately focuses on marinas. No mention is made of community sailing center or boat sharing programs.
- The discussion under the section **Needs and Gaps Addressed** (page 93) also inappropriately focuses on marinas. No mention is made of community sailing center or boat sharing programs.
- The discussion under the section **Benefits to Coastal Management** (page 93) explicitly and inappropriately equates marinas with boating. No mention is made of community sailing center or boat sharing programs.

The discovery process in Phase I and Phase II of the Assessment was inappropriately narrow, dominated by information gathering on marinas – as described on page 19. The draft Assessment does not report any investigation of the trends in boat sharing or community sailing centers. This imbalance must be rectified going forward.

Given all of the above, the draft Assessment strategy to “Improve Coastal Management Related to Water-Oriented Uses” is poorly scoped and severely unbalanced.

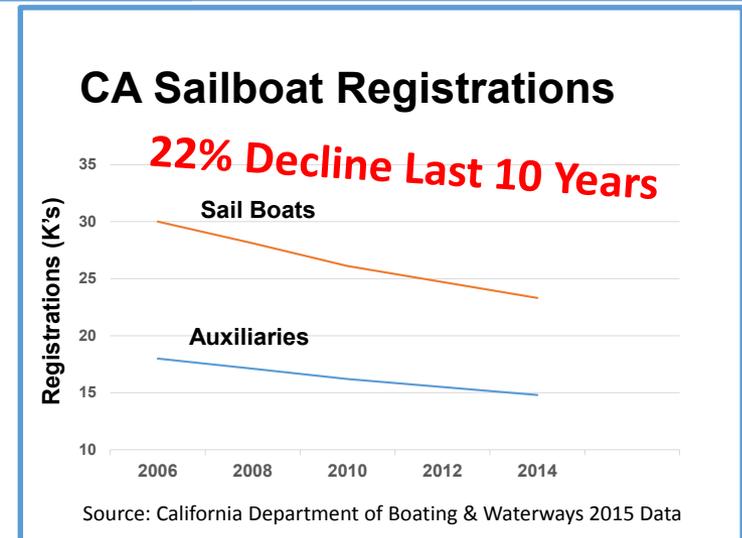
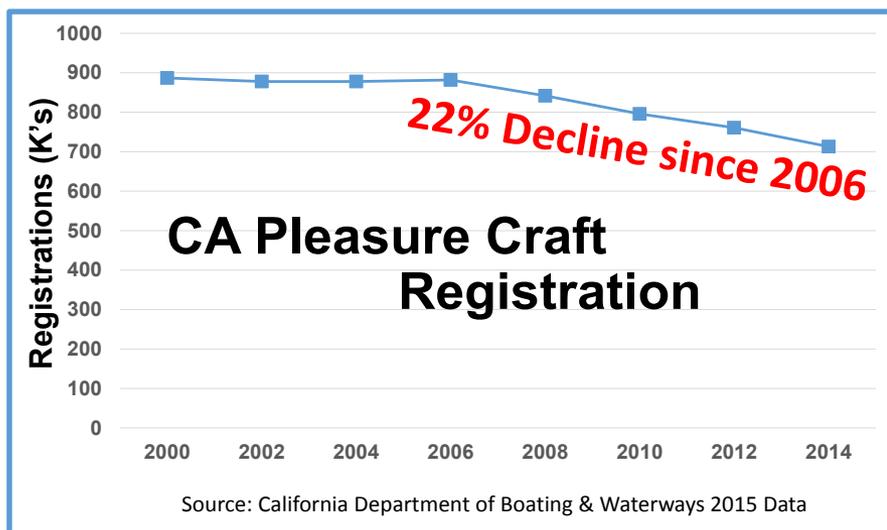
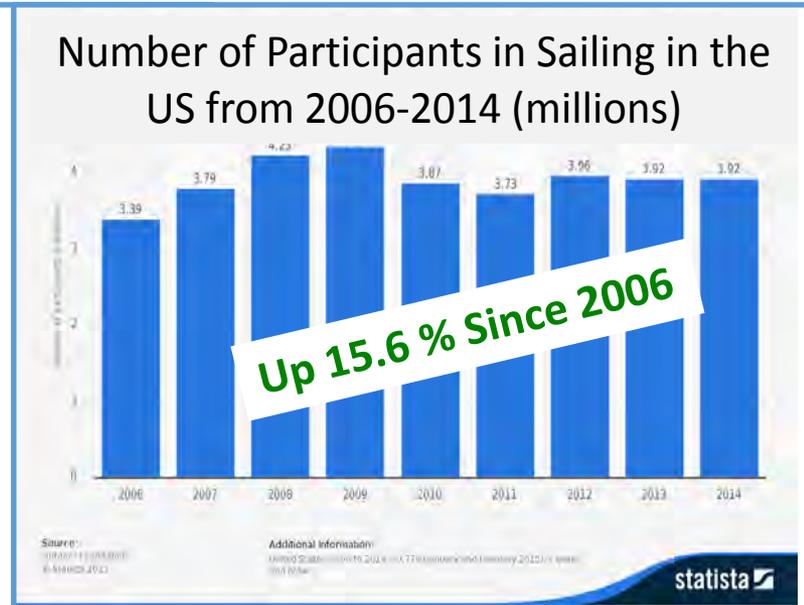
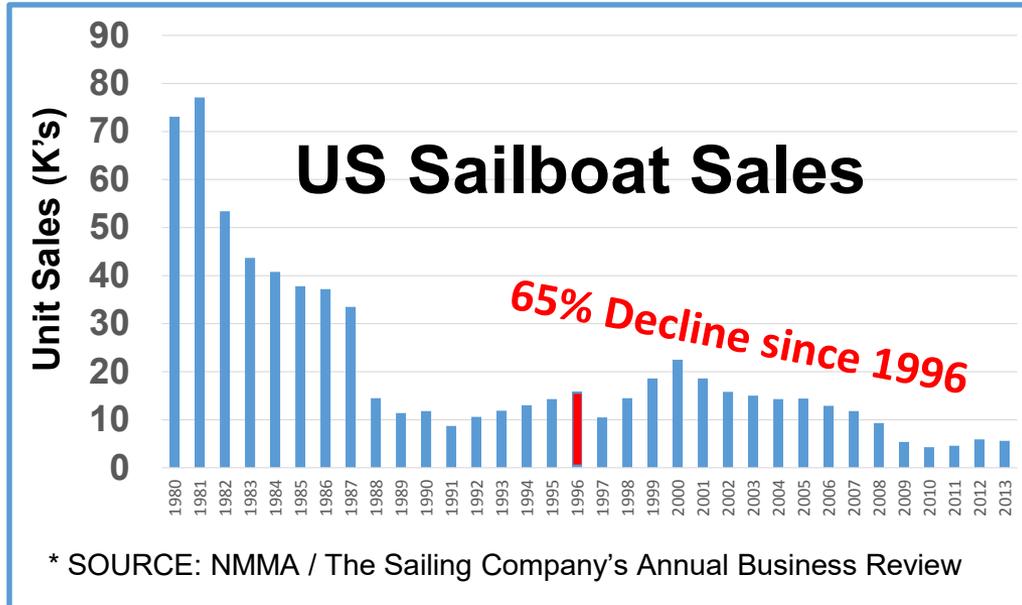
As such this strategy does not serve the public interest, and major modifications are required to provide a balanced view of recreational boating on the San Francisco Bay.

Thank you for your attention here.

Sincerely,

Hunter Cutting
1455 Alabama Street
San Francisco, CA 94110
huntercutting@gmail.com

Sailing Participation Steady Despite Drop in Private Boat Ownership





Sailing & Aquatic Center Expansion: A Source of Sailing Participation



- 29 Sanctioned US Sailing Centers
- 329 Registered Sailing Centers (62 on West Coast)
- 500+ Commercial Sailing Centers (~20 in 1975)
- >1,000 Public Access Not-for-Profits

Commercial Sailing Schools – Another Pathway for Growing Sailing Participation

- **<30' Boat Fleet: Grew 20%**
- **Membership: Up 30%**



OCSC Growth: 2010 - 2015

Source: OCSC Sailing, 2015

- **Membership: Tripled**
- **Fleet: Grew to ~50 Boats**



Club Nautique Growth: 2010-2015

Source: Club Nautique, 2015

**Growth Drivers: Shared Use Model
Socialization Opportunities
Emerging “Rent vs. Buy” Mentality**

Contact Information

Dave Guinther

Vice Chair, TISC Board of Directors

Dave.guinther@yahoo.com

508-574-2600 cell

www.onclippercove.com Blog



Citizens Committee to Complete the Refuge

P.O. Box 23957, San Jose, CA 95153

Tel: 650-493-5540

Email: cccrrrefuge@gmail.com

www.bayrefuge.org

Comments sent via electronic mail only

Lawrence J. Goldzband, Executive Director

San Francisco Bay Conservation and Development Commission

375 Beale Street, Suite 510

San Francisco, CA 94105

Attn: megan.hall@bcdc.ca.gov

14 August 2020

Re: San Francisco Bay Coastal Management Program Draft Assessment Strategy

Dear Executive Director Goldzband,

The Citizens Committee to Complete the Refuge (CCCR) submits these comments regarding the BCDC Assessment Strategy for the 2021 to 2025 NOAA Enhancement Cycle. We thank you for the opportunity to provide comments.

CCCR was originally formed in 1965 by a group of citizens who became alarmed at the degradation of the Bay and its wetlands. We joined together, and with the support of Congressman Don Edwards, requested that Congress establish a wildlife refuge. The process took seven long years and in 1972 legislation was passed to form the San Francisco Bay National Wildlife Refuge, the first national wildlife refuge in an urban area. In 1988, Congress authorized expansion of the refuge boundary to potentially double the original size. Our membership is approximately 2,000 people and we have the support of 40 local and national organizations--including open space advocates, hunters and environmental groups. We have taken an active interest in regulations, policies, implementation, and enforcement pertaining to the protection of wetlands and undeveloped lands that could support the expansion of tidal marsh habitats/species or the migration of tidal marsh habitats and species as sea level rises.

The BCDC Draft states "The HIGH priority level was given to this [wetland] enhancement area due to the historic loss of wetlands, increasing threats to wetlands in the Bay Area, and the urgent need to restore wetlands to ensure that they are resilient to sea level rise." (BCDC Draft July 2020, p. 26) New programs, policies and actions are needed to meet regional goals for wetlands protection and restoration. Stewardship of the bay ecosystem needs better support and action items in the final BCDC Assessment Strategy for NOAA.

BCDC has accomplished much during the past five-year plan, in terms of supporting the use of fill for habitat restoration and protection, and in terms of initiating and supporting community level planning for sea level rise adaptation. During this period, the 2015 *Baylands Ecosystem Habitat Goals Science Update* (BEHGU), the work of over one hundred scientists, was released. The BEHGU updated the 1999 *Bay Goals* document to

provide recommendations for the preservation and restoration of a functioning baylands ecosystem in light of the challenges of climate change and sea level rise. SEFI and SPUR also produced an important document in this period, *The San Francisco Bay Shoreline Adaptation Atlas*, which is a worthy guide to help communities use nature-based solutions for adaptation and resilience, and the Atlas educates people in many aspects of the Bay's ecosystem. These good works do not explicitly ask that planners and applicants commit to protecting and enhancing the ecosystem elements in their counties.

The Draft report indicates the Bay ecosystem faces an existential threat: "The survival of Bay Area tidal wetlands will depend on the inherent resiliency of the wetlands systems themselves and our ability to protect, restore and enhance them. **Without intervention, the region will lose critical wetlands and their functions**, including habitat provision, flood protection, water quality improvements (pollutant reduction), carbon sequestration, and the prevention of shoreline erosion through wave energy attenuation." (BCDC Draft July 2020, p. 26, bold added) BCDC needs to define and help implement the appropriate interventions.

It is clear that human welfare is extremely important. "Assessments of sea level rise risks and adaptation draw attention to issues of equity, both in terms of how some individuals or communities will bear a disproportionately greater impact from sea level rise than others, and how some individuals and communities may receive more benefits from sea level rise adaptation than others may." (San Mateo Assessment, 2018)

The challenge facing the Bay Area is to meet human needs and to also adaptively manage the Bay ecosystem to survive into the 22nd Century. The emphasis in this letter focuses on the weakness in the current draft regarding protecting the ecosystem. It is our conviction that the Bay Area is well able to meet human needs for welfare and development and preserve its treasured ecosystems.

"Managers need vulnerability assessments that address both biological and human welfare concerns as a first step toward developing adaptation strategies." (SFBJV 2011; Glick et al. 2011) It is obvious from the losses of baylands that have occurred, and in viewing our existing shoreline, that balance between the ecological and built systems does not exist. BCDC can begin to have an impact on reversing this imbalance through stringent application of its tidal wetlands, tidal flats, and climate change policies when reviewing permit applications for development along the shoreline.

The Draft report states "In summary, of the 60,000 acres of tidal marsh recommended for restoration by the 1999 Goals Project, over 7,000 acres of tidal marsh were restored as of 2009, and 30,000 more acres of restored tidal marsh are expected to result from future projects or habitat evolution of current projects." (BCDC Draft July 2020, p. 26) There is a big gap towards the goals, and limited space available to yet achieve the goals. Furthermore, if appropriate interventions don't occur, sea level rise will eliminate significant habitat areas and thus increase the deficit towards regional goals. If BCDC permits development projects that block or inhibit future restoration and habitat enhancement, then BCDC becomes a barrier to achieving the habitat goals. In the draft document and future documents on progress, BCDC should incorporate metrics on achieving habitat goals broken out by Suisun, North SF Bay, Central and South as the conditions and opportunities differ significantly and progress needs to be tracked in each sector. The BCDC Strategy and other BCDC guidance to counties and stakeholders should indicate with greater emphasis, the importance of

achieving the goals outlined in the 2015 BEHGU and that projects should be reviewed to assess whether they contribute or present obstacles towards reaching the habitat goals for San Francisco Bay.

BCDC is using the public interest in sea level hazards to aim its strategy where it can have great impact: “increasing demand from the public, elected officials, and the state for immediate action on sea level rise adaptation continues to drive these efforts forward. Because the strategy builds on this impetus and previous work, including existing relationships, research, and fora for discussion, it is highly likely that proposed program changes to increase resilience will succeed.” (BCDC Draft July 2020, p. 26) We recommend BCDC use this interest and demand to include a balanced assessment and adaptations that include preservation and enhancement of the Bay’s ecosystem in all of the projects sponsored or encouraged by BCDC. Such integration of viewpoints will not be easy. The Assessment Strategy discusses instances where there are competing interests, and as the 2018 County of San Mateo Sea Level Rise Vulnerability Assessment observes:

“As with built assets, considering natural assets in isolation does not facilitate a holistic or system wide view of vulnerability, yet putting these pieces together is an immense challenge.”

However, examples and prototypes do exist. Consider the Corte Madera marsh project. “In 2019, SFEI, Point Blue, and Marin County planners used Corte Madera as a case study to draw up hypothetical adaptation options over time, with an emphasis on nature-based solutions to preserve and enhance a key natural resource area.” (Estuary 2020) On a larger scale, the Highway 37 adaptive planning project tries to put ecosystem needs on an equal plane. Integrated planning of human and biological elements can be done at the same time and needs to be done at the same time, despite the difficulties. There are foundations committed to advancing climate resilience that may be willing to support integrated processes for vulnerability, assessment and adaptation planning.

Consider if policies of BCDC, possibly including legislative changes, are needed to meet the goals of social justice, ecosystem stewardship and sustainable development. The *Recovery Plan for Tidal Marsh Ecosystems of Northern and Central California* states under the topic of “Inadequate regulatory oversight”:

“Wetland regulation policies and practices can have a great impact on tidal marsh habitat and species. They usually help notify the public of wetlands values and divert inappropriate development. However, these policies and practices often do not adequately consider indirect and cumulative impacts on habitat quality and population viability over large spatial scales and long time frames.” (USFWS 2013)

BCDC recognizes that fragmentation “has reduced the baylands’ ability to support wildlife by decreasing the connectivity between populations and increasing edge effects that promote predation and anthropogenic stress.” (BCDC Draft July 2020, p. 22) Failure to consider habitat needs more regionally in a county, watershed or Operational Landscape Unit (OLU) when issuing permits, means that each permit is potentially adding to fragmentation. The next five-year plan can address this shortcoming.

Failure to fully consider cumulative impacts to the shoreline (when we use the word “shoreline” or “baylands” we recognize BCDC is limited to the 100’ shoreline band) of San Francisco Bay will also complicate adapting to

sea level rise. There are significant undeveloped portions of the Bay shoreline that fall into projected flood zones, and are anticipated to be inundated by future high tides, groundwater rise and flooding. Many of these areas also currently provide natural flood protection, or have been identified (see the *San Francisco Bay Shoreline Adaptation Atlas*) as locations that could provide nature-based resilience as well as crucial opportunities for wetlands and other habitat for Bay wildlife to migrate inland as the seas rise.

BCDC has recognized this important need in its updated Climate Change Policies, adopted in October 2011, with Policy #4 specifically highlighting:

“To address the regional adverse impacts of climate change, undeveloped areas that are both vulnerable to future flooding and currently sustain significant habitats or species, or possess conditions that make the areas especially suitable for ecosystem enhancement, should be given special consideration for preservation and habitat enhancement and should be encouraged to be used for those purposes.”

BCDC’s strategy for the next 5 years should seek to strengthen the strategy articulated in its Climate Change Policy #4, significantly increasing protections for these critical undeveloped areas along the Bay shoreline that are both vulnerable to flooding and sustain - or could sustain through restoration - significant habitat for Bay wildlife. This policy will allow time for these lands - including lands that Congress has already authorized to be added to the Don Edwards San Francisco Bay National Wildlife Refuge - to be acquired or donated for nature-based flood control and habitat restoration, and would act as an essential tool to advance the long-term resilience of the San Francisco Bay ecosystem.

One of the significant concerns we have had with processes such as Plan Bay Area, has been the emphasis on the use of Priority Conservation Areas (PCAs) as the focus of resource protection. We had raised similar concerns during the Adapting to Rising Tides (ART) process. Sadly, the PCA identification process has in large part proven inadequate for San Francisco Bay Area baylands and many areas of importance for conservation have not been identified as PCAs. We have previously raised concerns that the PCA framework was established through a fundamentally flawed process, based more on political consensus than science. It has been a process that has left some of the Bay Area’s more important natural and remaining undeveloped lands unprotected from increasing threats from urban development. The PCA process has failed to identify as PCAs baylands and wildlife habitats identified and documented by scientists and federal, state and regional resource agencies as being regionally significant to the health of the San Francisco Bay Estuary - baylands that also face imminent threats of urban development. The March 2020 final report for *Adapting to Rising Tides Bay Regional Sea Level Rise Vulnerability and Adaptation Study*, recognizes the limitations of PCAs in the following Key Takeaway:

“PCAs only contribute to a portion of the recreation, ecosystem services, and agricultural uses in the Bay Area. Lands within the Bay Area Protected Areas Database and natural lands outside of PCAs that do not have any protected status offer more recreation than PCAs, more groundwater recharge and peak flow retention than PCAs, and more brown pelican, depressional wetlands, heron & egret habitat,

lagoon, native oyster, pinniped, playa, Ridgway's rail, rocky intertidal, sandy gravel beaches, southern sea otter, transition zone, tidal flat, tidal marsh, and vernal pool habitat than PCAs."[emphasis added]

The report further states under a discussion of "Limitations" of PCAs that:

"...because PCAs are locally nominated by jurisdictions, they also represent places that local jurisdictions are willing to forego development. This may not always overlap with the areas within these cities or counties that are most important for conservation, restoration, or preservation." [emphasis added]

It is evident that strategies beyond PCAs are desperately needed if we are to conserve, protect and restore remaining undeveloped baylands capable of supporting tidal marsh migration, ecosystem services and compatible recreation. During this next five-year plan, BCDC should investigate and develop tools and strategies to protect such undeveloped baylands.

With respect to public access, trails should be reviewed during the next five-year plan. Much progress has been made in providing public access over the last fifty years. There are some places that deserve better access, but at this point "feasible" access should include consideration of the effects of public access on habitat. Trails are not habitat, even with green edges. Trails promote anthropogenic stress. And trails could become obstacles to baylands upslope migration if not appropriately sited. Not all trail uses are compatible with each other, for example care is needed to provide commuter bicycle trails away from where people are viewing wildlife. The *Adapting to Rising Tides* program did an admirable job of taking an initial assessment of the impacts of sea level rise on public access facilities. During the next five-year period BCDC should assess public access facilities to determine whether they present obstacles to baylands migration as sea level rises.

The water trail poses additional risk to wetland habitats. The programmatic EIR points out many potential significant impacts from water trail users as they tour the Bay and sloughs. Mitigation for these impacts requires surveys, monitoring, education and in some cases prohibitions. Is any of that mitigation happening? BCDC policy calls for public access to be sited, designed and managed to prevent significant adverse effects on wildlife. BCDC should undertake a systematic review of the Water Trails program in the next five-year plan and develop Adaptive Management strategy/programs if monitoring or mitigation measures are ineffective. If mitigation measures have not been implemented, then non-compliance should be rectified. Such an effort should be with appropriate agency partners, including the USFWS.

While CCCR is generally supportive of public transit, another issue of growing concern is potential increase in ferry traffic. The Assessment Strategy identifies several significant potential impacts of ferry traffic. Ferry traffic:

- does in fact result in erosion of marsh shorelines without proper regulation of ferry speeds in areas proximate to tidal marshes
- can alter the behavior of waterbirds and preclude waterbird use of open water habitats for extended periods, which is of particular significance if ferries operating at high speeds cross areas traditionally used by Surf Scoters and other diving ducks,

- can result in marine mammal strikes/disturbance (of particular concern for pupping sites)
- can result in adverse impacts to state/federally listed species

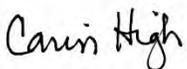
Some of these issues may be addressed through mitigation requirements if a BCDC permit is determined to be necessary. Frustratingly, impacts identified above have occurred or are proposed to occur without the benefit of any environmental analysis when public boat launches are used by privately owned and for-profit ferry operators that seem to have managed to utilize loopholes in existing regulations to escape any environmental review. BCDC should investigate whether it is appropriate for boat launches permitted by BCDC for public use be used by private ferries operating for profit.

The Assessment Strategy discusses “enforcement” in terms of the Marine Debris Program and with respect to Public Access violations. The document describes the existential threat to the Bay’s ecosystem; however, the Assessment Strategy appears to be silent on the matter of enforcing non-compliance with permit conditions required to mitigate impacts to the Bay’s habitats. What is BCDC’s strategy for ensuring compliance with mitigation measures protective of baylands or wildlife? How is permit compliance for successful implementation of habitat and wildlife mitigation measures assessed? Similarly, what is BCDC’s strategy to ensure unauthorized activities within BCDC’s jurisdiction are enforced and how will the program’s enforcement efficacy be assessed?

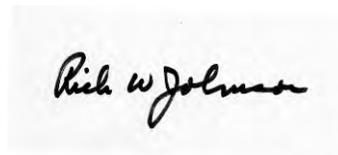
We urge BCDC to change the Assessment Strategy to better meet its responsibilities for protecting the Bay’s habitats and ecosystem. Nature is important to all people of the Bay Area, people of all incomes and ancestries; the stories from the Resilient-By-Design projects illustrate this truth quite well. (YouTube Channel [Resilient by Design | Two Years Later](#).) Measure AA passed with 70% approval which indicates broad support for Bay habitat restoration. BCDC will find broad support for emphasizing bay ecosystem conservation along with human welfare in its next five-year strategic plan.

We thank you for the opportunity to provide comments and ask that we be advised of any future opportunities to provide additional comments.

Respectfully,



Carin High
CCCR Co-Chair



Rick Johnson
CCCR Member

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Estuary 2020. ESTUARY News. JUNE 2020, Vol. 29, No. 2

Subject: Comment on BCDC draft Coastal Program Management Assessment Strategy for Commission on August 20th
Date: Friday, August 14, 2020 at 10:23:41 PM Pacific Daylight Time
From: Carisa Harris Adamson
To: Goldzband, Larry@BCDC, Hall, Megan@BCDC
CC: Jim McGrath, Aaron Peskin, Supervisor Catherine Stefani, Catherine Stefani (sfgov.org), Lee Hepner
Attachments: image.png, image.png, image.png

Dear Mr. Goldzband and Ms. Hall:

Thank you both for your continued dedication to the responsible development and use of San Francisco Bay. It is truly a special place that provides unique opportunities for our community. My name is Carisa Harris Adamson and I am a co-founder of the Treasure Island Sailing Center and the Chair of the Board of Directors since 2000. I am deeply committed to sharing our beautiful Bay with as many people in our community as possible for many reasons. Most importantly, when people experience the Bay, they take care of it.

I am writing in regards to the "San Francisco Bay Coastal Program Management Draft Assessment and Strategy for the 2021-2025 Enhancement Cycle" to be presented to the BCDC Commissioners on August 20, 2020. Although the plan has some relevant aspects, I feel that it lacks some critical components that should be addressed.

First, it appears that the primary analysis utilizes the number of boat slips and marina capacity as a proxy for public access to and use of the Bay. However, in reality, the number of slips and the percentage of slips filled are poor measures with low correlation to actual use. Worse, these measures completely ignore the fact that the access and use that does take place by boats in marinas are limited to mostly privileged individuals that can afford both a boat and a slip. Further, it has been documented that most boats in a marina primarily stay in the marina; their use is infrequent and reported to be, on average, once per month. Marinas have been referred to as "parking lots" on the Bay for good reason.

I believe there are better measures of public access to and use of the Bay that should be quantified and relied upon when planning for "coastal management related to water-oriented use". For example, the frequency and duration of boat use would be much better measures. Even better, would be an estimate of the person-hours spent on each boat, normalized to boat length.

There are numerous organizations in the Bay that optimize the number of person hours on the bay per boat. The OCSC Sailing is a great example of an organization that has perfected the shared boat model. Other sailing schools such as Club Nautique, Modern Sailing Academy and Tradewinds sailing

also provide thousands of person hours per boat compared to privately owned boats. Additionally, there are community sailing centers, like the Treasure Island Sailing Center and the Alameda Community Sailing Center, that provide thousands of hours of sailing.

At TISC, in 2019, we served over 4000 children and adults with more than 32,000 hours of sailing time on a fleet of about 60 boats that range between 6 and 24 feet. The total lineage of this fleet sums to 726 feet meaning that we get approximately 44 hours of water use time per foot of boat per year. If a 40 foot boat stored in a marina goes out an average of once per month with 5 people on it per trip of 6 hours, the equivalent measure would be 9 hours of water use time per foot of boat per year. However, a 40 foot boat used for classes and rented or "shared" that has 5 people on the boat 2 days per week for at even 25 weeks per year has an equivalent measure of 37.5 hours of water use time per foot of boat per year. Clearly, optimizing the use of boats parked in marinas is an important consideration for any plan designed to increase access and water use by our community; and it does so in a more socially just way.

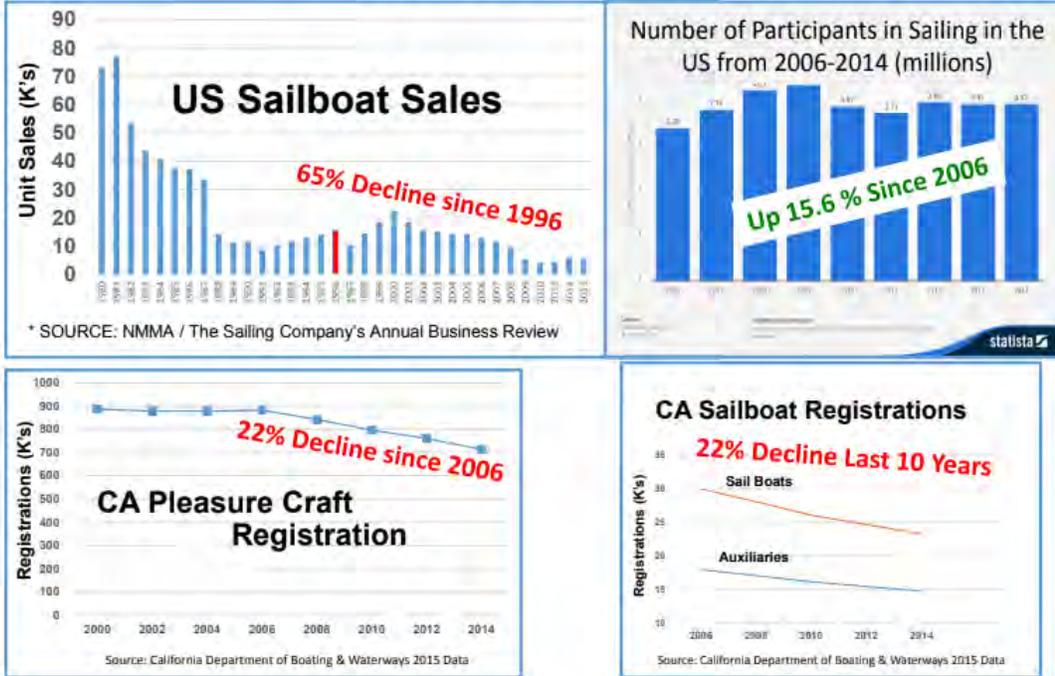
In short, the rise of car/ride shares, bike shares, office shares, and even home shares should encourage us to think about boating and bay use in a different way. Although marinas serve an important purpose, which is the parking of large boats that can not be lifted into and out of the water each day, I believe we have a responsibility to make sure that each boat that has the privilege of taking up space on our Bay is well utilized. I would also encourage BCDC to explore guidelines that would prioritize expansion of access points, like marinas, to programs or organizations that optimize use of their boats in terms of person hours spent on the water, the number of people in the community served per boat and the frequency of boat use.

A few years ago, we presented some statistics that support this approach (see figures below). We found that although boat sales were down the number of participants in sailing were going up because of the increase in community sailing centers which tops 1000 nationwide and is growing. Thus, a responsible growth of recreational use of the Bay must include community sailing centers, boat share programs and commercial sailing schools that optimize the use of each boat in a socially just way. Yet, neither of these types of uses are addressed in the current plan. Marinas are repeatedly mentioned as the way to measure use of the bay and access to the bay while sailing centers, sailing schools and boat share programs are completely omitted. The "Needs and Gaps Addressed" and "Benefits to Coastal Management" sections should include assessments of these types of programs to water access and use. Not including them would be misleading and misinformative when addressing this important topic.

I hope you will consider a more robust assessment strategy that will provide a more modern and accurate view of recreational boating on the San Francisco Bay.

Thank you for your time and consideration.

Sailing Participation Steady Despite Drop in Private Boat Ownership



Sailing & Aquatic Center Expansion: A Source of Sailing Participation



Commercial Sailing Schools – Another Pathway for Growing Sailing Participation

- **<30' Boat Fleet: Grew 20%**
- **Membership: Up 30%**



OCSC Growth: 2010 - 2015

Source: OCSC Sailing, 2015

- **Membership: Tripled**
- **Fleet: Grew to ~50 Boats**



Club Nautique Growth: 2010-2015

Source: Club Nautique, 2015

Growth Drivers: Shared Use Model
Socialization Opportunities
Emerging “Rent vs. Buy” Mentality

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Carisa Harris- Adamson
Chair, Board of Directors
carisa.harris-adamson@tisailing.org
415-640-0563

Subject: public comment

Date: Wednesday, August 19, 2020 at 1:14:25 PM Pacific Daylight Time

From: Howard Strassner

To: Hall, Megan@BCDC

Subject: [Draft 2021-2025 SF Bay Coastal Management Program Assessment and Strategy](#)

Date: Wednesday, August 19, 2020

From: Howard Strassner, 419 Vicente St. San Francisco, CA 94116

To: Megan Hall, BCDC

Thank you for the opportunity to review and comment on the subject.

There is another way to enhance the use of our beautiful Bay while minimizing adverse impacts on natural areas on the shore and in the waters. Dry storage of smaller boats adjacent to the Bay with a hoist to lift the boat from a trailer and then lower the boat to a small dock is in use at the Berkeley Marina and at the St. Francis and San Francisco Yacht Clubs among others. This reduces the cost of Bay access for small boat owners while insuring sail boats of a fast bottom at no cost and no harmful chemistry.

The commenter has been sailing on the Bay since 1962 and has owned a Cal 20 since 1970. His major contribution to Bay sailing was the initiation of Friday night racing at the GGYC which soon spread to many other yacht clubs. He also induced the SF BOS to request that the SF Marina study dry storage. The results of the study found that dry storage was feasible but that the loss of parking was not acceptable.

Subject: Re: public comment

Date: Wednesday, August 19, 2020 at 3:56:08 PM Pacific Daylight Time

From: Howard Strassner

To: Hall, Megan@BCDC

Sorry but one more comment

In California marinas are subsidized by low interest rate loans from the State (supported by the tax on gas used by boats). It is not right to use these funds for mega yacht berths.

On Wed, Aug 19, 2020 at 1:49 PM Hall, Megan@BCDC <megan.hall@bcdc.ca.gov> wrote:

Thank you for the comments Mr. Strassner. They will be posted [at this site](#) later today, and staff will address them in detail in the revised Assessment and Strategy document (which will likely be released in September).

Megan Hall, Ph.D.

Coastal Scientist

San Francisco Bay Conservation and Development Commission

(415) 352-3626

megan.hall@bcdc.ca.gov

pronouns: she/her/hers

<https://www.cdph.ca.gov/Programs/CID/DCDC/Pages/Immunization/ncov2019.aspx>

From: Howard Strassner <ruthow1@gmail.com>

Date: Wednesday, August 19, 2020 at 1:14 PM

To: "Hall, Megan@BCDC" <megan.hall@bcdc.ca.gov>

Subject: public comment

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