



June 2, 2011

San Francisco Bay Conservation & Development Commission
50 California Street, Suite 2600
San Francisco, California 94111

RE: Bay Plan 1-08 Climate Change Amendment

To Whom It May Concern:

The Air Issues and Regulations (AIR) Committee is a coalition of San Francisco Bay Area Publicly Owned Treatment Works (POTWs) working cooperatively to address air quality and climate change issues, under the guidance of the Bay Area Clean Water Agencies (BACWA). Many of our member agencies also manage potable water treatment, distribution systems, wastewater treatment, and biosolids residual programs. The AIR Committee has 18 member agencies, including large metropolitan facilities such as East Bay Municipal Utility District, Union Sanitary District, Central Contra Costa Sanitary District, and the City of San Jose. Together, AIR Committee member agencies treat over ninety percent of the municipal wastewater in the Bay Area and BACWA's overall membership includes agencies that provide sanitary sewer services to the more than seven million people living in the nine county San Francisco Bay Area.

The BACWA AIR Committee supports the Bay Plan and the proposed amendments to incorporate the findings of climate change adaptation to protect the Bay environment and essential public infrastructure from the potential impacts of sea level rise. In particular we support the following language in the Bay Plan Amendment, listed in the document *BPA 1-08 Draft Findings and Policies 2011.05.27*, which talks about protecting critical infrastructure:

- Section 6k in the Climate Change findings and policies: "Shoreline development and infrastructure, critical to public and environmental health and the region's economic prosperity, may be, or may become, vulnerable to flooding from sea level rise and storm activity. Important public shoreline infrastructure and facilities, such as airports, ports, regional transportation facilities, landfills, contaminated lands and wastewater treatment facilities are at risk of flood damage that could require costly repairs, or result in the interruption or loss of vital services or degraded water quality."
- Section 5a in the Climate Change findings and policies: "The entities that formulate the regional strategy are encouraged to consider the strategies and goals, which include advancing regional public safety and economic prosperity by protecting:
 - (i) existing development that provides regionally significant benefits;
 - (ii) new shoreline development that is consistent with other Bay Plan policies; and
 - (iii) infrastructure that is crucial to public health or the region's economy, such as airports, ports, regional transportation, wastewater treatment facilities, major parks, recreational areas and trails
- Section 7b in the Climate Change findings and policies, which states that specific types of projects that have regional benefits, including critical infrastructure that is necessary for existing development or to serve planned development should be encouraged if their regional benefits and their advancement of regional goals outweigh the risk from flooding.

- Section 6h in the Climate Change findings and policies, which talks about protecting and minimizing risks to critical infrastructure by using effective and innovative adaptation approaches.
- Section 7 in the Climate Change findings and policies mentions that specific types of projects should be encouraged if they do not negatively affect the Bay and do not increase risks to public safety, which includes "repairs of an existing facility". This is important so that wastewater treatments plants can continue to operate in a safe and efficient manner to protect public safety and the environment.

Keeping the above in mind, we would continue to support and be involved in the development process of the Bay Plan. Thank you for your consideration. Please contact me if you have any questions at 510.287.1337 or at scheng@ebmud.com.

Sincerely,



On behalf of Stephanie Cheng
BACWA AIR Committee Chair

Cc:

Amy Chastain, Executive Director of BACWA

James Sandoval, CH2M HILL/BACWA AIR Committee Project Manager