



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 23, 2017

California Natural Resources Agency

Subject: Comments on Draft *Safeguarding California Plan: 2017 Update – California's Climate Adaptation Strategy*

California Natural Resources Agency:

On behalf of the Bay Area Stormwater Management Agencies Association (BASMAA), thank you for the opportunity to provide comments on the Draft *Safeguarding California Plan: 2017 Update* (Update). 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.

Stormwater agencies throughout California are increasingly mandated by the State and Regional Water Boards to develop and implement stormwater management plans to achieve long-term water quality goals. This will require significant investment in green infrastructure and other approaches to capture, treat, and infiltrate stormwater runoff. We believe this work will play a significant role in supporting climate change resilience and should be appropriately addressed in the Update. As such, we appreciate the inclusion of Recommendation W-8, "Utilize low-impact development and other methods in state and regional storm water permits to restore the natural hydrograph." However, **we have some specific suggestions on how Recommendation W-8 could be improved.**

First of all, stormwater management and efforts to support implementation of green infrastructure solutions are being supported by more state agencies than just the State and Regional Water Boards. For example, the Department of Water Resources administers the Integrated Regional Water Management program and associated bond funds. Similarly, the Strategic Growth Council and State Coastal Conservancy have been on the forefront of efforts to integrate green infrastructure with other state priorities. **We recommend this section be revised to address programs and efforts that are already or will be implemented by all relevant state agencies,** not just the State and Regional Water Boards.

Secondly, we **recommend the Update make a strong connection between the Transportation and Water sectors in regard to stormwater management.**

Currently, the Transportation recommendations seem focused on impacts to transportation infrastructure as a result of climate change and not on the role transportation infrastructure plays in both causing and adapting to climate change impacts related to stormwater runoff, flooding, and increased temperature.

Transportation infrastructure makes up a significant amount of the impervious surfaces in urbanized areas, with streets and parking lots often constituting 25-50% of urbanized land areas. As such, transportation infrastructure is a major contributor

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to stormwater runoff and associated pollutants, as well as to urban heat islands. This will become a bigger issue with climate change as runoff may increase under more intense storms and heat islands get worse with increasing temperatures.

Transportation systems serve as the primary surface conveyance system for stormwater runoff and therefore represent a key opportunity to capture and manage stormwater before it enters underground drainage systems or receiving water bodies. Incorporating green stormwater infrastructure in roadways – such as through stormwater curb extensions, sidewalk infiltration planters, street trees, and rain gardens that capture, infiltrate, and treat runoff – creates “Green Streets” that improve water quality, reduce urban flooding, recharge groundwater, mitigate urban heat islands, and enhance the bicycle and pedestrian environment.

There is an existing statewide priority to implement “Complete Streets” to better accommodate bicycles, pedestrians, and transit and reduce greenhouse gas emissions by reducing vehicle miles traveled. Combining Green Streets and Complete Streets creates “Sustainable Streets” that are truly multi-benefit and essential to climate change resiliency in urbanized areas. As such, **BASMAA recommends revising Transportation Recommendation T-4 to include a new “Next Step” that specifically supports implementation of Sustainable Streets** as part of the State’s Active Transportation Program and other relevant programs, such as the Natural Resources Agency’s recent Urban Greening program. **We also recommend a partner recommendation in the Water section under Recommendation W-8**, with appropriate connections between the two to highlight the inter-related nature of these two sectors.

Similarly, **BASMAA recommends that the Plan recognize as an Ongoing Action in both the Water and Transportation sections** the Association of Bay Area Governments (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.

BASMAA also recommends the following changes to the Changing Climate Conditions Metrics section of Appendix B:

- Include metrics regarding increased urban flooding incidences caused by increased stormwater runoff volume and/or intensity
- Include a metric related to disaster funds distributed to local agencies for flood-related impacts due to increased stormwater runoff volume and/or intensity

BASMAA recommends the following changes to the Resilience Outcomes Metrics Appendix:

- Add a metric related to acreage of impervious area managed by downstream green infrastructure or volume of stormwater managed by green infrastructure – over time, municipalities will be managing more and more runoff to achieve water quality goals that should also be tracked in regard to climate resilience
- Incorporate Green Infrastructure Plans, Stormwater Resource Plans, and Watershed Management Plans in metrics related to planning documents addressing climate resiliency issues
- Change metric related to “Complete Streets features” built into transportation infrastructure projects to “Sustainable Streets features,” recognizing the importance and need to incorporate green infrastructure in these improvements to provide enhanced climate change resilience.

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,

A handwritten signature in cursive script that reads "Matt Fabry".

Matt Fabry, Chair
Bay Area Stormwater Management Agencies Association

cc: Bruce Wolfe, Executive Officer, San Francisco Bay Regional Water Board
Tom Mumley, Assistant Executive Officer, San Francisco Bay Regional Water Board
Keith Lichten, Watershed Management, San Francisco Bay Regional Water Board
Julie Alvis, Deputy Assistant Secretary, California Natural Resources Agency representative to
Urban Greening Bay Area, Sustainable Streets Roundtable
BASMAA Board of Directors