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September 12, 2011

John Laird, Chair
California Ocean Protection Council
California Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Dear Mr. Secretary:

Thank you for the opportunity to comment on the Ocean Protection Council's draft Strategic Action Plan for 2012-17.

As you know, Save The Bay is the oldest and largest membership organization working to protect and restore San Francisco Bay, with more than 30,000 supporters. Save The Bay won a legislative moratorium against placing additional fill in San Francisco Bay in 1965, and helped establish the world's first coastal zone management agency, the San Francisco Bay Conservation and Development Commission (BCDC). In 2011, Save The Bay celebrates 50 years of halting massive bayfill and dumping, restoring wetlands and engaging the community to save the Bay.

Our comments follow, under the relevant Strategic Plan headings:

Climate Change Focal Area

Issue 1: Storm Events, Coastal Flooding, and Sea-Level Rise

Action 1.2.2: Provide information to decision-makers regarding policy and regulatory changes needed to reduce risk and protect public resources.

Policy resolution developed that recommends changes in laws, regulations, guidance documents, and processes to reduce risk and protect public resources.

We recommend that OPC resolutions in this area be as specific as possible in recommending which laws, etc., and which agency jurisdictions or mandates need to be changed to advance the specific recommendations in the CAS, especially those regarding protecting habitat and habitat restoration opportunities in areas vulnerable to sea level rise and other climate impacts.



Issue 2: Ecosystem impacts of climate change

We understand the OPC's preference for focusing on marine ecosystems, but the strategic plan should be addressing tidal wetland impacts and issues as well, rather than leaving that to other state agencies. The health of ocean ecosystems is directly affected by estuarine habitats including tidal marshes, and the OPC can play a valuable catalyst role in research and policy development, including with its science funding, policy resolutions etc.

Save The Bay participated in the development of the Climate Adaptation Strategy (CAS) and has played a role in encouraging its adoption by state and Bay Area agencies and jurisdictions. We strongly encourage prioritizing a comprehensive CAS implementation strategy to ensure that responsible local and state agencies as well as the public better appreciate the potential impacts of rising seas on California's coastline.

Impacts from climate change are likely to be particularly dramatic around the Bay shoreline in the highly developed Bay Area. OPC should closely engage and coordinate with parallel state planning processes such as the Strategic Growth Council to ensure that statewide planning incorporates appropriate scientific sea level rise information and assumptions.

Sustainable Fisheries and Marine Ecosystems Focal Area

Objective 5.1 - MPA implementation

One crucial region of the coast identified for MPA development has not yet been addressed: San Francisco Bay. This OPC strategic plan should include actions to accelerate development and completion of an MPA for San Francisco Bay.

Land Sea Interaction Focal Area

Objective 7.2.3 - Statewide Trash Policy

Save The Bay is the Bay Area's leading proponent for reducing trash and marine debris flowing into San Francisco Bay and out into the ocean. Our Clean Bay Project works to educate residents about the marine debris and other toxic runoff flowing into the Bay from cities and neighborhoods and equips cities to take action to stop this contamination of our watershed.

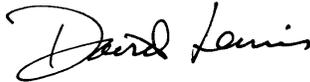
OPC's efforts have indeed brought widespread attention to the problem of marine debris and spurred legislation and local government action to reduce debris pollution. OPC's 2007 resolution on reducing and preventing marine debris played an important role in sparking action by fellow state agencies. OPC should play a leadership role in future expanded coordination efforts with colleague state agencies and ensure pursuit of continued aggressive goals and strategies.

This approach should focus on identifying specific legal and regulatory tools – existing or needed – which can be brought to bear on plastic pollution reduction efforts. OPC should review local and regional approaches already being taken in California and other areas of the U.S. to reduce marine debris and trash from land-based sources to evaluate effectiveness and make recommendations for which approaches should be replicated in other areas and statewide. Approaches to be evaluated should include:

- local ordinances to ban or discourage use of plastic bags, styrofoam food packaging, etc.
- trash TMDL (L.A. Water Board)
- stormwater permit trash limits (S.F. Bay Water Board)
- disposable plastic recycling programs

Thank you for the Council's leadership on this issue, and for your careful consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "David Lewis". The signature is written in a cursive, flowing style.

David Lewis
Executive Director