Subject: Bay Restoration Regulatory Integration Team (BRRIT)

Mr. Dave Pine, Chairman
San Francisco Bay Restoration Authority
1515 Clay St., Suite 1000
Oakland, California 94612

Dear Chairman Pine,

We are writing to describe our role in the development of the proposed Bay Restoration Regulatory Integration Team (BRRIT) and to express our interest in cooperating in the formation and operation of the BRRIT. We represent six federal and state regulatory and resource agencies charged with oversight of proposed projects that would impact resources in San Francisco Bay, namely the San Francisco Bay Conservation and Development Commission, San Francisco Bay Regional Water Quality Control Board, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, National Marine Fisheries Service, and the U.S. Army Corps of Engineers.

Measure AA provides a unique opportunity to accelerate the pace and scale of restoration work in San Francisco Bay. The Baylands Ecosystem Habitat Goals Science Update (2015) stresses the urgency of this accelerated restoration work; tidal wetlands that are restored and established by 2030 are more likely to flourish when sea level rise accelerates due to climate change. The importance of Bay restoration is also highlighted in other plans and reports, including the Recovery Plan for Tidal Marsh Ecosystems of Northern and Central California, the San Francisco Bay Plan, the San Francisco Basin Plan, the California Wildlife Action Plan, and the San Francisco Estuary Blueprint.

To achieve the goal of accelerated resiliency, a collaborative approach is envisioned for the six regulatory agencies, each of which has its own mandate. State and federal laws, including but not limited to the Clean Water Act, McAtreer-Petris Act, U.S. Endangered Species Act, Magnuson-Stevens Act, California Endangered Species Act, California Water Code, Rivers and Harbors Act, and Coastal Zone Management Act, require our agencies to evaluate all projects for
their impacts on natural resources and the human environment. Multi-benefit wetlands restoration projects are no different – they too must also be evaluated for their impacts to resources. While our agencies firmly support the overall effort to restore San Francisco Bay, we must also ensure that projects comply with laws and policies established to protect the environment. And, at the same time, we are looking for ways to serve the regulated community faster and more efficiently. We believe the concept of the Bay Restoration Regulatory Integration Team achieves those goals.

The formation and operation of the BRRIT would involve dedicated regulatory and resource agency staff who expedite the regulatory work required of Measure AA-eligible projects. More specifically, a collaborative, transparent pre-application process has been designed to expedite permit processing. The BRRIT would allow for project applications to be reviewed by an experienced team of regulatory and resource agencies in parallel, versus sequential reviews by each agency, and the coordinated pre-application process would document all issues and recommendations. To ensure success of the process, the Bay Restoration Regulatory Integration Team would be evaluated against quantitative performance measures, and a Policy Management Team (PMT) would be formed to coordinate with the BRRIT as necessary to resolve policy issues and provide direction for any elevated project issues. In addition, the PMT would be responsible for developing a list of overarching policy issues that may limit Bay restoration design flexibility. The PMT would also be responsible for developing and implementing initiatives to address these policy issues over time.

Since early in 2017, our agencies have participated in a series of meetings to discuss a coordinated permitting process for multi-benefit wetland restoration projects in San Francisco Bay. One year later, our six public agencies are aligned and support a coordinated permitting
strategy involving the formation of the Bay Restoration Regulatory Integration Team. If funded, we are ready to work with the San Francisco Bay Restoration Authority to implement and operationalize the BRRIT and the PMT and to work collaboratively to restore San Francisco Bay.

Sincerely,

Rick Bottoms
Rick M. Bottoms, Ph.D.
Chief, Regulatory Division
U.S. Army Corps of Engineers

Kaylee Allen
Field Supervisor
San Francisco Bay-Delta Fish and Wildlife Office
U.S. Fish and Wildlife Service

Lawrence J. Goldzband
Executive Director
San Francisco Bay Conservation and Development Commission

Alicia Van Atta
Assistant Regional Administrator for California Coastal Office
National Marine Fisheries Service

Gregg Erickson
Bay Delta Regional Manager
California Department of Fish and Wildlife

Bruce H. Wolfe
Executive Officer
San Francisco Bay Regional Water Quality Control Board
May 21, 2018

Governing Board
San Francisco Bay Restoration Authority
1515 Clay St,
Oakland, CA 94612

Re: Scientific Importance of Accelerating Restoration of San Francisco Bay Tidal Marshes

Dear Governing Board Members:

We are writing from the perspective of scientists with expertise in the Bay’s wetlands and waters and watersheds, who have contributed to long range regional environmental plans, including the 1999 Baylands Ecosystem Habitat Goals Report, and its 2015 update.

Both reports reflected the consensus of hundreds of scientists and managers and over 20 government entities, NGOs and academic institutions. Both reports recommended restoration of at least 100,000 acres of Bay wetlands to protect shoreline communities, improve flood control and water quality, support recreation and endangered species, and to improve the overall health of the Bay ecosystem. The San Francisco Bay Restoration Authority was established to support these goals.

A primary conclusion of the 2015 report is the urgent need to significantly accelerate the pace of bay wetlands in the face of sea level rise. Another key message was that the existing multi-agency permitting process constitutes a bottleneck that slows marsh restoration by months and years and thus increases the risk of failure, as sea level rise accelerates.

Therefore, to achieve the goals and recommendations of the region’s scientific, government and NGO leaders, policies and programs are needed to dramatically improve multi-agency collaboration and to accelerate the permitting process of local tidal marsh restoration projects.

The scientific basis for this recommendation is clear and compelling. Marshes that are restored earlier can capture sediment and grow peat each year, thus achieving higher elevations than marshes that are restored later. Marshes at higher elevations when sea level rise begins to accelerate rapidly can survive longer and provide more services. These services include shoreline protection, food-web productivity, improvements to water quality, and support for endangered species. Thus, marshes that are restored sooner are providing a greater return on investment.

Actions that alleviate that permit process bottleneck will provide the Bay Area with a better outlook for marsh restoration and resilience to sea level rise. For these reasons, we specifically stated in the Baylands Ecosystem Habitat Goals reports that permitting of restoration projects needs to happen more rapidly.

Respectfully,
Warner Chabot, Executive Director
Josh Collins PhD, Chief Scientist
Letitia Grenier PhD, Co-Director, Resilient Landscape Program
Robin Grossinger, Co-Director, Resilient Landscape Program
Jeremy Lowe, Senior Environmental Scientist
May 21, 2018

Dave Pine, Chairman
San Francisco Bay Restoration Authority
1515 Clay St., Suite 1000
Oakland, CA 94612

Re: Bay Restoration Regulatory Integration Team (SUPPORT)

Dear Chairman Pine,

On behalf of the Bay Area Council, I would like to express our support for the proposed Bay Restoration Regulatory Integration Team (BRRIT).

With the passage of Measure AA, the Bay Area has an extraordinary opportunity to make significant progress towards achieving 100,000 acres of restored tidal marshes, as called for in the Baylands Ecosystem Habitat Goals Report. As you know, many of these restoration projects also provide critical flood protection benefits for the shared water, wastewater, energy, and transportation infrastructure that powers the Bay Area’s economy. However, we’re in a race against time. The 2015 Science Update to the Goals Report warns us that tidal marshes established prior to 2030 “are more likely to flourish and provide ongoing benefits when the sea-level rise accelerates in the middle of this century”, and that to “achieve this goal, the planning, permitting, and construction of restoration on currently available lands must be accelerated.”

The existing regulatory process for restoration projects has long been identified as unnecessarily time consuming, and time is a luxury we can no longer afford. In order to accelerate the pace and scale of wetlands restoration efforts, we must have dedicated regulatory staff working in a collaborative team, with a commitment by the regulatory agencies to address policy issues that reduce flexibility in the design and permitting of restoration projects.

The proposed BRRIT represents a cost-effective solution to reduce permitting time for multi-benefit restoration projects via coordinated permitting, while ensuring compliance with all applicable state and federal laws. This proposal will accelerate and improve the permitting process, creating substantial net savings in time and money for large and small-scale multi-benefit wetland restoration projects. The BRRIT will help a large number of restoration projects get to implementation quickly and without costly delays.

In conclusion, I encourage the San Francisco Bay Restoration Authority to give this proposal its full support. Thank you for your leadership, and for considering our views.
Sincerely,

Jim Wunderman
President & CEO
Bay Area Council
May 23, 2018

Dave Pine, Chairman
San Francisco Bay Restoration Authority
1515 Clay St., Suite 1000
Oakland, CA 94612

Subject: Bay Restoration Regulatory Integration Team

Dear Chairman Pine,

I am writing to express support for the proposed Bay Restoration Regulatory Integration Team (BRRIT). With this effort, the San Francisco Bay Restoration Authority has the opportunity to improve the permitting process for multi-benefit wetland restoration projects throughout San Francisco Bay. Navigating the regulatory process has long been identified as a significant challenge to restoration projects. In order to accelerate the pace and scale of wetlands restoration efforts, we must have dedicated regulatory staff working in a collaborative team, with a commitment by the regulatory agencies to address policy issues that reduce flexibility in the design and permitting of restoration projects.

The Silicon Valley Leadership Group is a public policy business trade association composed of over 350 members and works with business, NGOs, and public officials to protect and enhance the quality of life and business environment in California. The San Francisco Bay is the ecological and economic heart of our region, and its health and longevity affect the many businesses and communities that call the San Francisco Bay Area home. As such, the Leadership Group has long worked to protect and restore the Bay, and more recently has leveraged our stakeholder convening capabilities to help drive the BRRIT process. In addition, Leadership Group staff sits on the SF Baylands Steering Committee and San Francisco Baylands Restoration Authority Advisory Board.

With the passage of Measure AA, the Bay Area has the opportunity to make significant progress towards the Baylands Ecosystem Habitat Goals Report call for 100,000 acres of tidal marsh in the Bay. The 2015 Science Update to the Baylands Ecosystem Habitat Goals Report stated: “Tidal marshes that are established by 2030 are more likely to flourish and provide ongoing benefits when the sea-level rise accelerates in the middle of this century. To achieve this goal, the planning, permitting, and construction of restoration projects on currently available lands must be accelerated.” While we have had great success over the past two to three decades restoring tidal wetlands, we are now in a race against time to restore many tens of thousands of acres of additional tidal wetlands.

The proposed BRRIT represents a thoughtful and cost-effective solution to reduce permitting time for multi-benefit restoration projects via coordinated permitting, while ensuring compliance with all applicable state and federal laws. This proposal aims to accelerate and improve the permitting process, creating substantial net savings in time and money for wetland restoration projects. The BRRIT will help a large number of these projects get to implementation quickly and without costly delays.

In conclusion, I respectfully request that you give this proposal your full consideration. Please feel free to contact me at mmpielke@svlg.org or 408-501-7864 with any questions.
Sincerely,

[Signature]

Mike Mielke  
Senior Vice President, Environment & Energy  
Silicon Valley Leadership Group

CC: San Francisco Bay Restoration Authority Board
23 May 2018

Dave Pine, Chairman
San Francisco Bay Restoration Authority
1515 Clay St., Suite 1000
Oakland, CA 94612

Subject: Bay Restoration Regulatory Integration Team

Dear Chairman Pine,

I am writing to express support for the proposed Bay Restoration Regulatory Integration Team (BRRIT). With this effort, the San Francisco Bay Restoration Authority has the opportunity to improve the regulatory process for wetland restoration projects in San Francisco Bay. Navigating the permitting process has long been identified as a significant challenge to restoration projects. In order to accelerate the pace and scale of wetlands restoration efforts, we must have dedicated regulatory staff working in a collaborative team, with a commitment by the regulatory agencies to address policy issues that reduce flexibility in the design and permitting of restoration projects.

The South Bay Salt Pond Restoration (SBSPR) Project is the largest tidal wetland restoration project on the West Coast. When complete, the project will restore 15,100 acres of industrial salt ponds to a rich mosaic of tidal wetlands and other wetland habitats. Restoration of the South Bay salt ponds provides an opportunity to begin to reverse the loss and degradation our wetlands have suffered by improving the health of San Francisco Bay for years to come.

However, there is an urgency around the implementation of the SBSPRP Project given the looming threat of sea level rise. The 2015 Science Update to the Baylands Ecosystem Habitat Goals Report stated: “Tidal marshes that are established by 2030 are more likely to flourish and provide ongoing benefits when the sea-level rise accelerates in the middle of this century. To achieve this goal, the planning, permitting, and construction of restoration on currently available lands must be accelerated.” While we have had great success in Phase 1 of our Project, we are now in a race against time to restore thousands of acres of additional tidal wetlands.
For example, as the SBSPR Project moves toward implementation of our Phase 2 actions, it has taken 14 months to receive a permit from a single agency, despite already having Programmatic permits in place for the overall project. During that time, we have been given insufficient staffing as a significant reason for the delays. The proposed BRRIT represents a cost-effective solution to reduce permitting time for multi-benefit restoration projects via coordinated permitting, while ensuring compliance with all applicable state and federal laws. This proposal aims to accelerate and improve the permitting process, creating substantial net savings in time and money for large and small-scale wetland restoration projects. The BRRIT will help a large number of restoration projects get to implementation quickly and without costly delays.

I encourage you to give this proposal your full consideration. Please feel free to contact me if you have further questions at John.Bourgeois@scc.ca.gov or 408.314.8859.

Sincerely,

John Bourgeois  
Executive Project Manager  
South Bay Salt Pond Restoration Project
Dave Pine, Chairman  
San Francisco Bay Restoration Authority  
1515 Clay St., Suite 1000  
Oakland, CA 94612

May 21, 2018

Subject: Bay Restoration Regulatory Integration Team

Dear Chairman Pine:

I am writing to express support for the proposed Bay Restoration Regulatory Integration Team (BRRIT). With this effort, the San Francisco Bay Restoration Authority has the opportunity to improve the permitting process for multi-benefit wetland restoration projects throughout San Francisco Bay. Navigating the regulatory process has long been identified as a significant challenge to restoration projects. In order to accelerate the pace and scale of wetlands restoration efforts, we must have dedicated regulatory staff working in a collaborative team, with a commitment by the regulatory agencies to address policy issues that reduce flexibility in the design and permitting of restoration projects.

Sonoma Land Trust began working in the baylands of southern Sonoma County more than three decades ago. We have protected over 6,500 acres there, much of which is now under the management of our partners at the San Pablo Bay National Wildlife Refuge, the California Department of Fish and Wildlife, and Sonoma County Regional Parks. In 2015, we completed a ten-year effort to restore nearly 1,000 acres of tidal wetlands at Sears Point, a project that required considerable time and expense dedicated to permitting. With Sonoma Land Trust’s recent award of Measure AA funds, we are preparing to engage in a planning effort that will lead to additional large-scale wetland restoration in Sonoma County, restoration that will be facilitated by the BRRIT.

Measure AA provides the Bay Area with the opportunity to make significant progress towards the Baylands Ecosystem Habitat Goals Report call for 100,000 acres of tidal marsh in the Bay. The 2015 Science Update to the Baylands Ecosystem Habitat Goals Report stated: “Tidal marshes that are established by 2030 are more likely to flourish and provide ongoing benefits when the sea-level rise accelerates in the middle of this century. To achieve this goal, the planning, permitting, and construction of restoration on currently available lands must be accelerated.” While we have had great success over the past two to three decades restoring
tidal wetlands, we are now in a race against time to restore many tens of thousands of acres of additional tidal wetlands.

The proposed BRRIT represents a cost-effective solution to reduce permitting time for multi-benefit restoration projects via coordinated permitting, while ensuring compliance with all applicable state and federal laws. This proposal aims to accelerate and improve the permitting process, creating substantial net savings in time and money for large and small-scale wetland restoration projects. The BRRIT will help a large number of restoration projects get to implementation quickly and without costly delays.

In conclusion, I encourage you to give this proposal your full consideration. Feel free to contact me at 707-526-6930 or dave@sonomalandtrust.org.

For the land,

Dave Koehler
Executive Director
May 24, 2018

Dave Pine, Chair
San Francisco Bay Restoration Authority
1515 Clay St., Suite 1000
Oakland, CA 94612

Subject: Bay Restoration Regulatory Integration Team - SUPPORT

Dear Chair Pine,

I am writing to express SPUR’s support for the proposed Bay Restoration Regulatory Integration Team (BRRIT). With this effort, the San Francisco Bay Restoration Authority has the opportunity to improve the permitting process for multi-benefit wetland restoration projects throughout San Francisco Bay. Navigating the regulatory process has long been identified as a challenge to restoration projects, and it slows them down significantly. Meanwhile, the Baylands Ecosystem Habitat Goals Report 2015 Science Update found that because of climate change, we must accelerate our restoration efforts: the report recommended that by 2030, we must establish new tidal marshes to bolster the Bay’s adaptive capacity and maintain habitat and migration space for mid-century sea level rise.

SPUR has long been a supporter of restoring San Francisco Bay and improving community resilience in the region. Recently, we supported Measure AA, served on the Board of the Resilient by Design Bay Area Challenge, and I currently serve on the Restoration Authority’s Advisory Council, where we received a full briefing on the BRRIT earlier this month.

It is clear that in order to accelerate the pace and scale of wetlands restoration efforts, we must have dedicated regulatory staff working in a collaborative team, with a commitment by the regulatory agencies to address policy issues that reduce flexibility in the design and permitting of restoration projects. The proposed BRRIT represents a cost-effective solution to reduce permitting time for multi-benefit restoration projects via coordinated permitting, while ensuring compliance with all applicable state and federal laws. This proposal aims to accelerate and improve the permitting process, creating substantial net savings in time and money for large and small-scale wetland restoration projects.

I encourage you to give this proposal your full consideration.

Sincerely,

Laura Tam
Sustainability + Resilience Director
May 25, 2018

Dave Pine, Chairman
San Francisco Bay Restoration Authority
1515 Clay St., Suite 1000
Oakland, CA 94612
Via e-mail to: amy.hutzel@scc.ca.gov

Subject: Support for the Bay Restoration Regulatory Integration Team

Dear Chairman Pine,

I write to express the Port of San Francisco’s support for the proposed Bay Restoration Regulatory Integration Team (BRRIT). The Port of San Francisco is an enterprise agency of the City of San Francisco, dedicated to advancing environmentally and financially sustainable maritime, recreational and economic opportunities while protecting and enhancing San Francisco Bay and its shoreline habitat.

At the Port we have sought to improve the ecological value of our remaining natural shorelines by restoring and maintaining wetland, transition zone, and coastal upland habitat. As we have been working over the last two years to update our Waterfront Land Use Plan, we have heard from our Working Group, Technical Advisory Groups and members of the general public how highly they value wetland restoration and other multi-benefit projects that achieve ecological function and shoreline resiliency. We share these values and believe that with the proposed BRRIT, the San Francisco Bay Restoration Authority (Authority) has the opportunity to facilitate such projects throughout San Francisco Bay.

With the passage of Measure AA, the Bay Area has the opportunity to make significant progress towards the Baylands Ecosystem Habitat Goal of restoring 100,000 acres of tidal marsh in the Bay. However, navigating the regulatory process poses a significant challenge to fully realizing that goal. We expect that dedicated regulatory staff, working in a collaborative team with a commitment by the regulatory agencies to resolve policy issues that currently reduce flexibility in the design and permitting of restoration projects, will achieve more efficient and cost-effective wetland restoration. The 2015 Science Update to the Baylands Ecosystem Habitat Goals Report states that “Tidal marshes that are established by 2030 are more likely to flourish and provide ongoing benefits when the sea-level rise accelerates in the middle of this century. To achieve this goal, the planning, permitting, and construction of restoration on currently available lands must be
accelerated." More efficient permitting will enable us to deliver wetland restoration projects during this critical window of opportunity.

The proposed BRRIT represents a solution to reduce permitting time for multi-benefit restoration projects while ensuring compliance with all applicable state and federal laws. This proposal aims to improve the permitting process and promote solution-oriented collaborations to achieve substantial net savings in time and money for large and small-scale wetland restoration projects. The BRRIT will enable timely implementation of many restoration projects and make best use of public funds to support such projects. I encourage you to give this proposal your full consideration. If you have any questions, please do not hesitate to contact me at 415.274.0553/diane.oshima@sfport.com or Carol Bach at 415.274.0568/carol.bach@sfport.com.

Sincerely

\[Signature\]

Diane Oshima
Deputy Director, Planning and Environment Division
Port of San Francisco
May 25, 2018

Dear Chairman Pine:

On behalf of Bay Planning Coalition’s (BPC) Board of Directors and members, I write to express our support for the proposed Bay Restoration Regulatory Integration Team (BRRIT) and its accompanying Bay Restoration Policy and Management Team (BRPMT). BPC is a nonprofit, member organization that advocates for sustainable commerce, industry, infrastructure, recreation and the natural environment connected to the San Francisco Bay and its watershed. Together with our nearly 150 member organizations, we work diligently to ensure, among other things, that land on the Bay is used wisely and developed in economically and environmentally sound ways.

We believe that wetland restoration in San Francisco Bay is critical to protecting the region’s valuable shoreline assets and natural resources. With the proposed BRRIT and accompanying BRPMT, the San Francisco Bay Restoration Authority (the Authority) has the opportunity to improve the permitting process and policies for multi-benefit wetland restoration projects throughout San Francisco Bay. Navigating the regulatory process has long been identified as a significant challenge to restoration projects. In order to accelerate the pace and scale of wetlands restoration efforts, we must have dedicated regulatory staff working in a collaborative team, with a commitment by the regulatory agencies to address policy issues that reduce flexibility in the design and permitting of restoration projects.

Furthermore, with the passage of Measure AA, the Bay Area has the opportunity to make significant progress towards the Baylands Ecosystem Habitat Goals Report call for 100,000 acres of tidal marsh in the Bay. The 2015 Science Update to the Baylands Ecosystem Habitat Goals Report stated: “Tidal marshes that are established by 2030 are more likely to flourish and provide ongoing benefits when the sea-level rise accelerates in the middle of this century. To achieve this goal, the planning, permitting, and construction of restoration on currently available lands must be accelerated.” We have had great success over the past two to three decades restoring tidal wetlands, however we are now in a race against time to restore many tens of thousands of acres of additional tidal wetlands.

While we have strong general support for the proposed effort, we ask the Authority and the participating regulatory agencies to make clear whether BRRIT...
funding would primarily contribute to the Project Analysis and Permitting arm of the team or if it would contribute to the Policy & Management group as well. We would also appreciate a better understanding of the type of projects that would be eligible for BRRIT, including projects that are under consideration by the Authority versus projects that have been awarded funding from the Authority, as well as equivalent multi-benefit restoration projects that are not funded or being considered by the Authority.

Lastly, we encourage the Authority to consider reviewing BPC’s draft white paper entitled, “Shore Restoration/Resiliency Projects in SF Bay: An Opportunity for Improving Regulatory Efficiency.” Developed by our Sustainable Waterfronts Committee, the paper explores permitting approaches in other regions and provides a number of recommendations and “best practices” that are well-aligned with the proposed BRRIT and accompanying BRPMT. You can find and download the white paper by visiting BPC’s website at www.bayplanningcoalition.org or download directly with this link: http://bayplanningcoalition.org/wp-content/uploads/2017/11/BPC-White-Paper_11212017-final-draft.pdf.

The proposed BRRIT and accompanying BRPMT represent a cost-effective solution to reduce permitting time for multi-benefit restoration projects via coordinated permitting, while ensuring compliance with all applicable state and federal laws. This proposal aims to accelerate and improve the permitting process and associated regulatory policies, creating substantial net savings in time and money for large- and small-scale wetland restoration projects. The BRRIT and accompanying BRPMT will help a large number of restoration projects get to implementation quickly and without costly delays.

In conclusion, I encourage you to give this proposal your full consideration. If BPC can be of any assistance moving forward, please do not hesitate to contact me at 510-768-8310 or by e-mail at john@bayplanningcoalition.org.

Sincerely,

John A. Coleman
Chief Executive Officer
Bay Planning Coalition