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Secretary Wade Crowfoot
California Natural Resources Agency
California Nature
1416 9th St #1311, Sacramento, CA 95814
Submitted via email to CaliforniaNature@resources.ca.gov

CC: Jennifer Norris, Deputy Secretary for Biodiversity

May 14, 2021

# Recommending San Francisco Bay's Wetlands as a "30 by 30" Priority for Biodiversity, Climate Resilience and Outdoor Equity

Dear Secretary Crowfoot, Deputy Secretary Norris, and staff,

We applaud your administration for your commitment to preserving our state's rich diversity of lands and waters, to protecting biodiversity, and to advancing climate resilience and ensuring access to the outdoors for all Californians through your 30 by 30 Initiative. This initiative could not come at a more pivotal time for our state and globe, and we are proud to see California continuing to demonstrate its leadership. On behalf of our 25 organizations and coalitions, representing hundreds of thousands of Californians, we write to enthusiastically encourage the California Natural Resources Agency to recognize and prioritize the San Francisco Bay Estuary, and specifically the protection, restoration and resilience of San Francisco Bay's wetlands and adjacent uplands that support marsh migration as sea levels rise as critical priorities for the state's 30 by 30 Initiative.

As the largest estuary on the Pacific Coast, containing 77% of California's remaining coastal wetlands, over 1,000 species of animals, 130 species of fish, millions of annual migratory shorebirds (more than any other estuary south of Alaska) and over a dozen endangered species, San Francisco Bay isn't just important to California - it is important to the hemisphere.

Beyond a biological hotspot, San Francisco Bay is also the economic engine of Northern California, with a healthy Bay supporting billions of dollars of economic output, including the region's globally-significant tourism industry, active commercial fishing and crabbing industries, four major ports, including the 5th most-active container port in the nation, and an outdoor economy that rivals any in the globe.

Our region has worked hard for decades to protect and restore the San Francisco Bay Estuary, and we are proud to be home to the largest wetland restoration effort in the western United States, with thousands of acres of former salt ponds, hayfields and more in the progress of restoration back to tidal marshes, providing flood protection for inland communities, carbon sequestration for our climate, critical habitat for endangered wildlife, and outdoor recreation

opportunities for the more than 7 million Bay Area residents who represent the rich diversity of our state.

However, this remarkable progress in protecting and restoring the Bay faces an existential threat from climate change and development pressures. Sea level rise, in particular, is the single largest threat to the future of the San Francisco Bay ecosystem, threatening to drown the Bay's wetlands, and potentially flooding over 80,000 homes, forcing the relocation of over 100,000 existing jobs and 85,000 planned new jobs, requiring the re-routing of over 5 million daily highway trips, and threatening inundation of hundreds of contaminated sites, including Superfund sites, across the region, among the wide-ranging impacts. In fact, according to a study by the U.S. Geological Service, Point Blue Conservation Science and others, a full  $\frac{2}{3}$  of California's socioeconomic impacts from sea level rise are expected to be experienced in the San Francisco Bay Area, with the Pacific Institute further anticipating that 4 out of 5 of the greatest impacts in California from sea level rise, both in terms of economic loss and human impact, will be in counties along San Francisco Bay.

As part of the state's climate resilience efforts, there is a critical need to elevate the threat of sea level rise and to prioritize the resilience of San Francisco Bay's mosaic of shoreline habitats in the coming decade, promoting the protection and acquisition of at-risk baylands, promoting the rapid restoration of recently-acquired wetlands awaiting funding and/or permits for restoration, as well as the protection and acquisition of the 14,400 acres of open space areas identified as necessary for wetlands to migrate upslope as sea levels rise, 70% of which are currently unprotected and at-risk of development. Our collective actions will determine whether San Francisco Bay will continue to survive as a site of hemispheric biological importance, or lose much of its biodiversity and the numerous benefits (flood control, water quality, fish nurseries, shorebird and waterfowl wintering grounds on the Pacific flyway, carbon sequestration, etc.) that the Bay's wetlands provide.

#### Our specific recommendations:

- 1. Identify the San Francisco Bay Estuary, specifically the protection, expansion and resilience of the Bay's wetlands, as a statewide priority for the state's 30 by 30 Initiative
- 2. Prioritize the acquisition of unprotected San Francisco Bay wetlands, restorable wetlands, and "transition" areas for wetlands to migrate upslope as sea levels rise, with an immediate emphasis on those at risk of development
- **3.** Partner with the U.S. Fish and Wildlife Service, conservation organizations, land trusts and the philanthropic community to promote the protection and acquisition of wetlands, restorable wetlands and other shoreline habitat within the expansion boundaries of the Don Edwards San Francisco Bay National Wildlife Refuge

**4.** Work with the CA Attorney General to oppose development in undeveloped San Francisco Bay shoreline areas containing habitat or habitat restoration potential that are at risk from sea level rise, similar to the approach the AG's office is taking towards development in high-risk wildfire areas

In sharing these recommendations, we highlight the unique value of San Francisco Bay's wetlands to provide multiple benefits in achieving the state's goals:

- Climate Resilience: Coastal wetlands are globally recognized as providing a valuable buffer for sea level rise, with wetland protection and restoration recommended in numerous regional, state and federal reports, including the Ocean Protection Council's 2020-2025 Strategic Plan, the San Francisco Bay Conservation and Development Commission's Adapting to Rising Tides: Bay Area report, the San Francisco Bay Shoreline Adaptation Atlas, the Bay Ecosystem Habitat Goals Update, the Tidal Marsh Ecosystem Recovery Plan and more. Coastal wetlands have also been recognized as an important "blue carbon," acting quicker and better at trapping organic carbon than forests and delaying carbon increases for longer -- providing an important natural tool for combating climate change.
- Biodiversity: San Francisco Bay's wetlands act as the nurseries for the Bay, providing habitat to hundreds of fish and wildlife species and playing an integral role forming the base of marine and terrestrial food webs. The Bay is home to over a dozen endangered species, including endangered wetland species such as the California Ridgway's Rail and Salt Marsh Harvest Mouse, both endemic to San Francisco Bay, and acutely vulnerable to climate change-induced sea level rise. The fact that San Francisco Bay supports so many species that have been listed as threatened or endangered highlights the existential threat to the tidal wetlands habitats that support them.
- Wildlife Abundance: San Francisco Bay is a critical stopover point along the Pacific Flyway migration route of shorebirds and waterfowl, which number over one million birds at the height of migration more migrating shorebirds than any other coastal site in the United States. As the largest estuary on the Pacific coasts of both North and South America, the Bay offers an abundance of habitat for tired migrating birds. San Francisco Bay includes three Important Bird Areas due to the high number of rare and endangered bird species and the sheer number of shorebirds and waterfowl supported by the surrounding wetlands. The area is also been recognized by the Western Hemisphere Shorebird Reserve Network, which ranks it as being of "Hemispheric Importance" to shorebirds. Waterfowl and shorebirds' reliance on the San Francisco Bay raises the importance of restoring wetlands and adjacent uplands as sea levels rise and inundate the tidal mudflats that are vital for these migrating species.
- Outdoor Equity: San Francisco Bay and the Bay's wetlands are a critical recreational resource for the more than 7 million residents of the nine-county San Francisco Bay Area, including acting as the primary access to nature for numerous socioeconomically

vulnerable communities throughout the region, including Alviso, East Palo Alto, Newark, Oakland, San Francisco Bayview-Hunters Point, Richmond, Marin City, San Rafael and more. With sea level rise threatening shoreline open space and public access, ensuring the resilience of the Bay's wetlands and adjacent uplands also ensures the resilience of access to nature along the shoreline. The pandemic has highlighted the importance of access to open space and the healing benefits of time spent in nature for all communities.

Thank you for your consideration, and we look forward to supporting the California Natural Resources Agency and state partners in the implementation of this important effort.

Sincerely,

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