Bay Planning Coalition

August 3, 2026

National Oceanic and Atmospheric Administration
Office for Coastal Management
Via email: czma.california-evaluation@noaa.gov

Re: Comments on Performance Evaluation of the California Coastal Management Program

Dear NOAA Office for Coastal Management:

On behalf of the Bay Planning Coalition (BPC), I write in support of the California Coastal Management Program and its continued approval and implementation under the Coastal Zone Management Act.

Founded in 1983, BPC is a nonprofit, membership-based organization representing business, public agencies, ports and infrastructure providers, private industry, local governments, and other entities working in and around San Francisco Bay. Our mission is to advance policies and practical solutions for a stronger Bay through leadership, advocacy, and cross-sector collaboration. Our members bring direct experience navigating the regulatory systems that govern the Bay and delivering the infrastructure, restoration, resilience, and waterfront projects on which the region depends.

BCDC and the Coastal Conservancy are essential to San Francisco Bay

BPC's work is focused primarily on San Francisco Bay rather than the outer coast. We therefore have limited direct engagement with the California Coastal Commission. However, the California Coastal Management Program also encompasses the San Francisco Bay Conservation and Development Commission (BCDC) and the State Coastal Conservancy—two institutions that are essential to the infrastructure, economic vitality, and resilience of the Bay Area. NOAA's performance evaluation has important implications for these institutions.

BCDC oversees approximately 1,000 miles of Bay shoreline and implements the federal consistency provisions of the Coastal Zone Management Act within its jurisdiction. Its review responsibilities encompass numerous federal activities affecting the Bay, including navigation dredging, flood-risk studies and projects, military base reuse, and facilities managed by federal agencies such as the National Park Service. These are not peripheral activities: they support the third largest metropolitan economy in America, the continued operation of ports and navigation channels, the protection of communities and infrastructure from flooding, public access to the shoreline, and the responsible use and redevelopment of waterfront lands.

BCDC's federal consistency role helps ensure that federal actions with potential impacts to the Bay reflect the policies of the San Francisco Bay Plan and hew to regional priorities. The Bay Plan is a publicly reviewed, periodically updated document that aims to balance multiple land and resource uses, such as conservation, public access, maritime activities, industry, infrastructure, and shoreline development. BPC and other stakeholders regularly participate in

the public processes that shape Bay Plan amendments, helping ensure the Plan continues to support the Bay Area's economy, environment, and resilience.

The State Coastal Conservancy is another key to the region's ability to deliver restoration, public access, sea level rise and extreme weather adaptation projects. Its funding, technical assistance, and convening capacity help local agencies and infrastructure providers move complex projects from planning to implementation. It is also a key partner and co-funder on federal projects. Withdrawing millions of dollars of federal grant funds dedicated to coastal management in California would especially hamstring the Conservancy's operations and its ability to deliver coastal resilience.

Coordinated coastal oversight improves projects and regional outcomes

For project proponents and public agencies, BCDC's CZMA review provides a defined process for identifying regional concerns, coordinating among agencies, and resolving issues before they become more difficult or costly. Federal navigation dredging illustrates the practical value of this framework. In its recent review of the Army Corps' 2026-29 maintenance dredging program, BCDC supported continued dredging needed to maintain safe and reliable navigation while requiring sediment testing, environmental work windows, monitoring, analysis of disposal alternatives, and beneficial reuse of dredged sediment at wetland restoration sites. These measures allow essential navigation work to proceed while protecting water quality and wildlife and directing a valuable regional resource toward shoreline restoration and resilience. This is the kind of coordinated outcome BPC supports: essential infrastructure moving forward with clear expectations, delivering broader regional benefits.

This approach of cooperative federalism has supported a broader regional transition over the last 20 years from treating dredged sediment solely as a disposal problem to recognizing it as a resource. Through the Bay Area's Long-Term Management Strategy, a federal/state interagency partnership, more than 30 million cubic yards of dredged sediment have been beneficially reused at major restoration and habitat projects, including Hamilton Wetlands and the Middle Harbor Enhancement Area. Those projects illustrate the practical value of coordinated coastal governance: federal navigation investments can maintain economically vital channels while also restoring habitat, increasing shoreline resilience, and reducing reliance on ocean disposal.

Do not diminish the state's role in decisions that shape the Bay

BPC strongly supports efforts to make permitting and regulatory processes more efficient, coordinated, timely, and accountable. That is why in 2025 we supported efforts by BCDC to streamline some of its own permitting regulations, and why in 2026 we developed and are co-sponsoring proposed state legislation (AB 2051) that would improve interagency permitting for coastal resilience, saving public dollars and speeding implementation of needed flood risk reduction and coastal adaptation projects. Improving a system, however, is fundamentally different from diminishing the state's role in decisions with substantial local and regional consequences. Effective reform should produce clearer requirements, earlier coordination, disciplined timelines, and greater accountability—not uncertainty about which policies apply or how conflicts will be resolved.

Bay Planning Coalition

Federal agencies and project sponsors seeking federal permits, approvals, or funding have worked within California's CCMP framework for decades. Materially altering this framework without a clear replacement could create uncertainty, delay decisions, increase costs, and make coordination more difficult for navigation, flood protection, resilience, transportation, and waterfront projects already facing multiple federal, state, and local requirements. Efficient project delivery and effective state oversight are not competing goals; when the process works well, each supports the other.

In conducting its evaluation, BPC encourages NOAA to recognize the practical value that California's coastal management institutions provide to project proponents, the business community, local governments, and the public. We respectfully urge NOAA to affirm California's continued participation in the Coastal Zone Management Act and the continued role of BCDC and the State Coastal Conservancy within the state's approved coastal management program. Preserving this framework—and continuing to improve its efficiency, coordination, and accountability—will best serve the Bay Area and California as a whole.

Thank you for considering the perspective of the Bay Planning Coalition and its members.

Sincerely,



Laura Tam
Chief Executive Officer
Bay Planning Coalition