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June 29, 2016

To: California Air Resources Board  
California Department of Transportation  
California Energy Commission  
California Environmental Protection Agency  
California Natural Resources Agency  
California State Transportation Agency  
Governor's Office of Business and Economic Development

SUBMITTED ONLINE ([www.casustainablefreight.org](http://www.casustainablefreight.org))

Re: California Sustainable Freight Action Plan – Draft Discussion Document  
(May 2016)

Bay Planning Coalition is glad for the opportunity to comment on this draft of the California Sustainable Freight Action Plan (“the Plan”).

Bay Planning Coalition 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.

While we value much that is included in this version of the Plan, we believe that the state's approach to the future of its freight transport system must include dredging of coastal shipping channels and beneficial reuse of the related dredged materials.

Well-dredged coastal shipping channels are not only vital to efficient freight transport in and out of California, but also have benefits that directly relate to the goals expressed in the Plan. They reduce emissions by easing the entry and exit of ships from ports and allowing ships to move more goods in fewer trips because they can be fully loaded (rather than “light loaded”). When ships can take more direct routes and operate more efficiently due to more ideal water depths, they emit less carbon dioxide. Additionally, easily accessible ports have an immediate positive impact on the competitiveness of California's economy compared to those of other coastal states. If it does not address dredging, any plan for California's freight transport future will put the state at an economic disadvantage; particularly as other states are making a concerted effort to invest in the accessibility of their ports.

Beneficial reuse of dredged material is a related effort that must be part of any effective freight transport strategy being developed now; especially as the threat of sea level rise increases. Marshland and other barriers formed by beneficial reuse will play a key role in protecting the state's infrastructure from the impacts of sea level rise in key locations up and down the coast, including along the San Francisco Bay. In the Bay Area, for example, the ports of Oakland and San Francisco and their affiliated international airports; several key interstate highways, bridges, rail lines and surface streets; and the campuses of many of the region's top employers are all in the direct path of rising seas. Without the benefits of beneficial reuse their precarious positions

put the state's entire freight economy at great risk.

Additionally, we believe it would be wise of the Plan to include beneficial reuse for another reason: environmental impact. Many beneficial reuse projects provide additional habitat for animals and plants, including those which can further contribute to improving air and water quality. In addition to being good for the state's natural environment, this could be an effective way to engender support from the Plan from the environmental advocacy community.

Thank you for your hard work on this plan and for considering our comments. Please feel free to reach out if I can provide any additional information.

Sincerely,



John A. Coleman  
Chief Executive Officer  
Bay Planning Coalition