COMMITTEE FOR
GREEN FOOTHILLS

July 17, 2019

The Honorable BCDC Commissioners
San Francisco Bay Conservation and Development Commission
455 Golden Gate Avenue, Suite 10600
San Francisco, CA 94102-7019
Via email: larry.goldzband@bcdc.ca.gov

RE: Preliminary Recommendations for Proposed Bay Plan Amendment No. 2-17 Concerning Social Equity and Environmental Justice

Dear Commissioners:

Thank you for your thoughtful consideration of the Preliminary Recommendations for Social Equity and Environmental Justice around the San Francisco Bay. Committee for Green Foothills represents over 1,000 households and advocates on their behalf for the protection of open space, farmlands, and natural resources throughout the region. We recognize the importance of keeping the San Francisco Bay accessible to all, while protecting this resource as designated by the California Constitution. We appreciate the opportunity to comment on these proposals.

We are writing today concerning the public access portion of the Preliminary Recommendations. We fully believe the public access to the San Francisco Bay needs to be inclusive and welcoming to all regardless of one's social economic status, racial, or ethnic background.

To ensure that access is fully available to all comers, we fully support maintaining visual access to the water. Often the Bay is visually blocked by new development thereby creating an exclusionary situation which is not in keeping with the Public Trust Doctrine of maintaining access for all for the public's well-being.

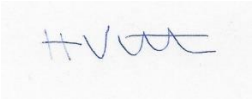
We also fully support maintaining public access for all income levels and people of all ethnic and racial backgrounds while ensuring that ecologically sensitive areas are protected. We respectfully ask that any new proposals minimize adverse effects on wildlife by siting, designing, and managing public access in a thoughtful manner that minimizes adverse human and wildlife interactions, while creating access that is safe, convenient and well maintained.

In closing, we urge BCDC to adopt the recommendations to maintain access for all to the crown jewel of our region. The San Francisco Bay is a public asset whose access must be celebrated and thoughtfully managed so that everyone feels welcome and included.

We appreciate keeping Green Foothills via Helen Wolter at helen@greenfoothills.org apprised of any and all matters relating to these proposals.

Again, thank you for your consideration of our comments.

Respectfully,



Helen Wolter
Legislative Advocate, Committee for Green Foothills

COMMITTEE FOR
GREEN FOOTHILLS
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July 12, 2019

Clesi Bennett
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Re: Proposed Bay Plan Amendment No. 2-17 Concerning Social Equity and Environmental Justice

Dear Clesi,

Thank you for the opportunity to comment on BCDC's proposed Bay Plan Amendment No. 2-17. We are very impressed by the depth and breadth of the work and analysis leading up to BCDC staff recommendations.

Like BCDC, the Port of San Francisco is focusing on how best to ensure that principles of social equity and environmental justice are deeply embedded in Port policies and carried out in Port programs and projects. These principles are reflected throughout the June 2019 Draft Port of San Francisco Waterfront Plan, now in circulation for public review and comment, as well as in the Port's 2019-2023 Strategic Plan.

In addition to these planning documents, the City of San Francisco (including the Port as a participating department) participates in the Government Alliance on Race and Equity (GARE) network of municipal, regional, and state governments working to achieve racial equity and advance opportunities for all in department decision-making, resource allocation, and policies. The Port also is developing a Port-wide Economic Benefit Framework, with community input and for Port Commission review in the coming year, to help advance the equity goal of the Port's Strategic Plan: Ensure Port activities advance equity and public benefit, and attract a diversity of people to the waterfront.

During these Port efforts, and as part of our on-going work with BCDC staff to align Port Waterfront Plan and BCDC Special Area Plan policies, we look forward to aligning efforts to achieve social equity and environmental goals along the San Francisco waterfront. In the meantime, we have the following

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comments and questions regarding BCDC staff's preliminary recommendations for amending the Bay Plan:

1. Environmental Justice and Social Equity

Policy 3 (Staff Report p. 17) Are there any criteria that will be proposed to describe how the Commission would determine whether equitable, culturally relevant outreach has been provided in identified vulnerable or disadvantaged communities?

Policy 4 (Staff Report p. 18) requires project applicants to identify disproportionate project impacts if a project is in an identified vulnerable or disadvantaged community and requires local governments or the Commission to address them through their permitting or environmental processes, within bounds of their respective authorities and jurisdictions. It would be helpful to provide proposed criteria or guidance to develop a shared understanding of how local governments and community stakeholders can discuss and determine disproportionate impacts and, hopefully build stronger, collaborative relationships.

2. Public Access

Finding c and Policy 8 (Staff Report p.19, 26) We would like BCDC's findings and public access policies to include a clearer recognition of the unique characteristics of urban waterfront public access areas. Please consider adding language acknowledging that there are times and places where public spaces can invite and foster diverse social interactions and strengthen community bonds through active gatherings and group activities (e.g., art fairs, outdoor concerts, recreational uses and concessions) that enliven public access areas. Waterfront areas in urban settings like San Francisco are available to a broader diversity of populations than natural and shoreline areas located more remotely from population centers. Public access policies for urban parks and public access areas should include some provision for active uses and designs, flexible spaces that can support a variety of programs and recreational uses, including accessory commercial activities (e.g., food service, pop-up uses), and interactive designs with adjacent developments. Allowing design flexibility in urban public access areas is consistent with the proposed social equity policies, and Public Access Policy 5 to promote inclusive, meaningful community engagement and influence in developing public open spaces that are embraced by the community. Parks and public access areas that are active and well-used also contribute to the safety and security of urban waterfronts.

Finding h and Policy 2 (Staff Report p.20; 24) Please consider the extent to which the uneven distribution of public access around the Bay may be a result of requiring on-site project-based public access instead of plan-based public access. Policy 2 allows consideration of in-lieu public access near identified disadvantaged or vulnerable communities, but only if it isn't feasible near the project site. Could Finding h be broadened to state that Special Area Plans provide opportunities to consider how a plan-based approach to providing public access could result in a more equitable distribution of public access resources throughout a plan area by, for example redirecting public access obtained through project permits to underserved locations? And could Policy 2 be broadened accordingly?

Policy 5 (Staff Report p. 25) requires meaningful community involvement in siting, design, programming, and management. It would be helpful to provide proposed criteria or guidance to develop a shared understanding of how local governments and residents can work together to develop stronger, collaborative community relationships.

3. Mitigation

Policy 3 (Staff Report p. 37) calls for meaningful involvement of nearby communities in certain mitigation project processes (identification and prioritization of potential projects, monitoring and programming of a mitigation site). It would be helpful to provide proposed criteria or guidance to develop a shared understanding of how local governments and residents can work together to develop stronger, collaborative community relationships that would satisfy BCDC's standard.

Policy 4 (Staff Report p.38) adds equity to considerations of appropriate location and design of compensatory mitigation. It would be helpful to provide proposed criteria or guidance for these determinations.

Thank you for this opportunity to comment. We look forward to continuing to work with BCDC towards equitable access and safe enjoyment of the Port of San Francisco waterfront. Given our respective efforts to update our planning policies and actively address the pressing issues of social and economic equity, we welcome the opportunity to exchange information in the interest of developing shared concepts and strategies that align and strengthen our collective efforts. Please do not hesitate to contact me at diane.oshima@sfport.com if I can answer any questions about these comments.

Sincerely,

Diane Oshima
Deputy Director, Planning & Environment

cc: Anne Cook
Kari Kilstrom
Lindy Lowe

SFEP

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July 12, 2019

Zachary Wasserman
Chair
SF Bay Conservation and Development Commission
455 Golden Gate Avenue, Suite 10600
San Francisco, CA 94102-7019
ATTN: Clesi Bennett

RE: Bay Plan Amendment No. 2-17 Concerning Social Equity and Environmental Justice

Dear Chair Wasserman:

Thank you for the opportunity to comment on the proposed Bay Plan Amendment No. 2-17. The San Francisco Estuary Partnership (Partnership) commends BCDC's effort to incorporate environmental justice and social equity into the planning, design and permitting of shoreline projects. The Staff Report and Preliminary Recommendation for Proposed Bay Plan Amendment No. 2-17 acknowledges the contribution of government agencies in the legacy of underrepresentation and injustice for California Native Americans and
low-income communities of color, and recognizes that addressing environmental justice and social equity is essential for the health and resilience of the entire San Francisco Bay Area.

The Partnership recently led more than 70 organizations to collaborative agreement on long term goals and a suite of actions to be taken over the next five years to protect, restore, and sustain the San Francisco Estuary. The resulting 2016 Estuary Blueprint reflects the changing context of Estuary management over the last few decades, focusing on the need to plan and adapt to climate change. The Blueprint acknowledges that some communities are more vulnerable to the impacts of climate change than others and that using resiliency planning to address issues related to environmental justice and social equity is critical. The Blueprint further recognizes that the health of the Estuary and the health of our communities are interdependent, and that social-ecological resilience is an area that should be further addressed in the next version.

Since the release of the 2016 Estuary Blueprint, the Partnership has worked to build capacity to address racial and environmental justice more fully in our work and incorporate it into our projects and initiatives. We have participated with BCDC in this learning process through the Government Alliance on Race and Equity as well as through the Bay Area Regional Collaborative, and have seen exciting shifts in our program as we have moved to put racial and environmental justice toward the heart of our work.

Although there are areas of the proposed Bay Plan Amendment No. 2-17 that could benefit from some further attention and refinement (in particular the mitigation section includes some confusing language), and there may be

additional Bay Plan sections that could or should be revised (the climate change section for example), proposed Bay Plan Amendment No. 2-17 is an important step in addressing disproportionate impacts and equitable distribution of benefits, and we commend BCDC for putting forth the amendment. These actions and others provide an important starting point for greater equity, inclusion and justice. We encourage the Commission to see this as a beginning to a long-term conversation with community leaders, equity advocates and disproportionally impacted communities about their concerns and vision for the future of the Bay shoreline. There is much work to do, and we applaud the Commission for taking this exciting step.

Sincerely,

Caitlin Sweeney, Director

July 12, 2019

San Francisco Bay Conservation and Development Commission
455 Golden Gate Avenue, Suite 10600
San Francisco, CA 94102

Dear BCDC Commissioners,

Thank you for considering the recommendations we the members of the Environmental Justice Review Team submitted on April 22, 2019 in response to BCDC's proposed Environmental Justice and Social Equity Amendment (EJ Amendment) for the San Francisco Bay Plan (Bay Plan). Based on the extensive adoption of our recommendations into the May 31st Staff Planning Report, we commend BCDC for genuinely recognizing community input as a supportive and worthwhile priority in this amendment process.

The Staff Planning Report includes proposed findings, justifications, and policy amendments that we feel adequately address previously lacking environmental justice considerations in the Bay Plan. BCDC Staff excelled at accurately and thoroughly capturing in the May 31st Staff Planning Report the intentions and explanations raised by the EJ Review team, which aimed to address and rectify historic discriminatory and unfair policies that have caused disproportionate exposure to pollution, as well as underrepresentation in policy-making for low-income and communities of color.

The proposed recommendations to the EJ Amendment not only bolster BCDC's commitment to prioritize EJ and Social Equity values and principles in the agency's work and processes, but the *complete* adoption of these recommendations into the Bay Plan will also communicate to marginalized communities that they are invaluable stakeholders in the Commission's decision-making process. Groups who have a long history of racial and socio-economic discrimination will acknowledge and memorialize this historic decision by a government agency to take accountability for the full range of environmental and societal consequences associated with its decisions. Thus, communities will be more receptive to partnership opportunities, which are critical to ensuring the sustainability of BCDC's permitted programs, as well as to the overall resilience of the region.

This collaborative effort in which the EJ Review Team has participated has already presented a shining example of what can be accomplished when previously disparate perspectives can unite as equals for a shared cause; "To protect and enhance San Francisco Bay and to encourage the Bay's responsible and productive use for this and future generations." By retaining all of the recommendations set forth in the Staff Planning Report, BCDC will emerge as a government leader that has realized genuine community trust. The Commission will also continue to serve as a role-model to other regional, state and national government agencies undergoing restructuring efforts around Environmental Justice, Social Equity, Diversity and Inclusion, especially those agencies entrusted with permitting authority.

In this critical moment in history when over 700 cities around the world, including six Bay Area cities, have declared a state of climate emergency, time is of the essence. The United Nations recently published a report underscoring that Climate Change will have the greatest impact on the most vulnerable communities; "Climate change carries immense implications for human rights, including to life, food, housing and water. It will also impact democracy, as governments struggle to cope with climate consequences and persuade constituents to accept the major social and economic transformations required – rendering civil and political rights vulnerable."[1]

We can no longer afford to advance with business as usual, at the mercy of industry and development interests. BCDC cannot both declare a commitment to protecting our region from current and impending health, safety, and climate impacts while also continuing to allow budgets and project timelines alone to dictate permitting procedures. Like "canaries in the coalmine," low-income communities of color, and other marginalized and vulnerable groups are at the most risk now, but the reality will reach all communities throughout the Bay much sooner than we think.

Therefore, we the Environmental Justice Review Team, and the communities we serve, strongly urge BCDC to commit to the full adoption of all of the amendments set forth in the Staff Planning Report. We presented these recommendations as mandatory, yet preliminary, steps in the right direction if we want to truly protect environmental and social health and justice in the Bay Area.

Again, we appreciate your consideration of these issues, and look forward to BCDC's publication of the final EJ Amendment to the San Francisco Bay Plan.

Sincerely,

Members of The Environmental Justice Review Team

Nahal Ghoghaie Ipakchi

Sheridan Noelani Enomoto

Julio Garcia

Terrie Green

Carl Anthony

Paloma Pavel

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[1] World faces 'climate apartheid' risk, 120 more million in poverty: UN expert https://news.un.org/en/story/2019/06/1041261

July 10, 2019

Zachary Wasserman
Chair, Bay Conservation and Development Commission
455 Golden Gate Avenue, Suite 10600
San Francisco, CA 94102

RE: Bay Plan Amendment No. 2-17

Dear Chair Wasserman and Commissioners,

The undersigned organizations are writing to recommend changes to the proposed Bay Plan Amendment No. 2-17, "Environmental Justice and Social Equity."

According to estimates from the Bay Area Council Economic Institute, the Bay Area could suffer $10.5 billion in damages from an extreme storm event under current sea levels. Furthermore, the Ocean Protection Council estimates sea levels at the Golden Gate will likely witness as much as 13 inches of sea level rise by 2050, and as much as 41 inches by 2100. Restored wetland habitat can help adaptation efforts in parts of the Bay, yet the San Francisco Estuary Institute estimates these projects will become increasingly cost-prohibitive beyond 2030 on account of sea level rise.

In short, the Bay Area has an exceedingly small window to defend shoreline communities and infrastructure of all types from rising sea levels, and the exigencies of climate change require any action taken by BCDC—or any other agency with jurisdiction over the Bay shoreline—to be in the service of speeding projects and reducing costs. That's why many of our organizations were early participants and supporters of the Bay Regional Regulatory Integration Team.

We are concerned that several of the policy changes under the proposed Amendment 2-17 would hinder efforts to protect coastal communities and infrastructure from rising sea levels, and detail those concerns in the below comments and suggestions.

Environmental Justice and Social Equity, Draft Policy Change 2
BCDC lacks legal jurisdiction over local planning processes, and a recent audit concluded that limited staff resources "is hindering [BCDC's] ability to fully achieve" several of its primary objectives. As such, we recommend the following changes:

> *Since addressing issues of environmental justice and social equity should begin as early as possible in the project planning process, the Commission should support~~,~~ <u>and</u> encourage~~, and expect~~ local governments to include environmental justice and social equity in their general plans, zoning ordinances, and in their discretionary approval processes. ~~Additionally, the Commission should be a leader in collaborating~~*

~~transparently with other agencies on issues related to environmental justice and social equity that fall outside of the Commission's authority or jurisdiction.~~

Environmental Justice and Social Equity, Draft Policy Change 3
This proposed policy change establishes a vague and subjective standard for community engagement and outreach which could be abused to indefinitely delay critical shoreline protection projects. It is unclear who will determine if a project's outreach and engagement was sufficient, and by what standards this outreach will be judged. BCDC should provide clear guidelines as to the amount and types of public engagement a project sponsor is expected to provide. In lieu of such clarity, we recommend the following changes:

> *Local governments and project applicants are ~~should be~~ encouraged ~~and expected~~ to conduct equitable, culturally-relevant community outreach and engagement to meaningfully involve potentially impacted communities for major projects and appropriate minor projects in identified vulnerable or disadvantaged communities~~, and such outreach and engagement should continue throughout the Commission review and permitting processes~~. Evidence of how community concerns were addressed should be provided. ~~If previous outreach and engagement were insufficient, further outreach and engagement should be conducted prior to Commission action.~~*

Environmental Justice and Social Equity, Draft Policy Change 4
As written, this proposed change could delay and add costs to critical shoreline flood protection projects. This requirement to assess project impacts is redundant as it already falls within the purview of a CEQA analysis which is conducted by the local lead agency. Also, BCDC policies must have a direct nexus to the subjects that are within its legal purview under the McAteer-Petris Act. Furthermore, the language contains no mechanism for weighing a project's benefits against potential adverse impacts. Finally, BCDC policies must have a direct nexus to subjects that are within its legal purview under McAteer-Petris. We recommend the following changes:

> *If a project is proposed within an identified vulnerable or disadvantaged community, potential disproportionate ~~burdens from~~ project ~~s~~ impacts on shoreline public access should be identified with the potentially impacted communities. Local governments and the Commission should take measures through environmental review and permitting processes, within the scope of their respective authorities, to avoid~~,~~ and/or minimize~~, and/or compensate for disproportionate~~ ~~adverse project~~ such impacts on the identified vulnerable or disadvantaged communities in which the project is proposed.*

Shoreline protection, Draft Policy Change 1
Modifications to the bay shoreline produce ripple effects that impact other areas of shoreline, particularly at the Operational Landscape Unit scale. While in certain instances requiring project applicants to analyze these impacts may be reasonable, we're concerned that a broad interpretation of this policy change could be used to unduly halt critical shoreline protection projects, or to render such projects financially infeasible through compensatory requirements. Ultimately, protecting the bay shoreline will require approving shoreline protection projects and accepting some risk. Also, BCDC policies must have a direct nexus to subjects that are within its legal purview under McAteer-Petris. We recommend making the following changes.

> *New shoreline protection projects and the maintenance or reconstruction of existing projects and uses should be authorized if…(f) adverse impacts on shoreline public access at ~~to~~ adjacent or nearby areas, such as increased flooding or accelerated erosion, are avoided or minimized. ~~If such impacts cannot be avoided or minimized, measures to compensate should be required.~~*

Mitigation, Draft Policy Change 3

As written, this proposed change could delay and add costs to critical shoreline flood protection projects. Terms like “meaningful involvement”, “insufficient”, and “appropriate minor projects” should either be clearly defined or deleted.

> *For major projects that require mitigation and appropriate minor projects that require mitigation, nearby communities should be meaningfully involved in an equitable and culturally-relevant manner. In particular, underrepresented communities should be involved. This should include consultation with the community in the identification and prioritization of potential projects, and in the monitoring and programming of a mitigation site. If previous outreach and engagement was insufficient, further outreach and engagement should be conducted prior to the Commission action.*

Thank you for your leadership, and for considering our views.

Sincerely,

Jim Wunderman
President & CEO
Bay Area Council

John Coleman
President & CEO
Bay Planning Coalition

Bob Glover
Executive Officer
Building Industry Association

Kristin Connelly
President & CEO
East Bay Leadership Council

Cynthia Murray
President & CEO
North Bay Leadership Council

Rosanne Foust
President & CEO
San Mateo County Economic Development Assn.

Mike Mielke
Senior Vice President
Silicon Valley Leadership Group

From: "Church, Sarah GSA - Sustainability" <Sarah.Church@acgov.org>
Date: Monday, July 15, 2019 at 12:44 PM
To: "Bennett, Clesi@BCDC" <clesi.bennett@bcdc.ca.gov>
Subject: RE: Questions on BCDC's proposed EJ policies

Hi Clesi,

Here are my comments on the draft:

- One item covered in the proposed policies is the limited role that BCDC plays in the entitlement process, and the role of local governments which can set a process on the right track (or not), mentioned on page 15. I would be curious to know if clear guidelines or toolkits exist for local governments to guide practical consideration of equity in a bay development process. I appreciated the very basic but delineated practical policy measures that can be undertaken on page 4. I envision a guide with case studies and parameters for implementing equity in a permit approval process, when submitting an application for a permit (on the part of a local government), and other relevant processes. If this guidance is already available, it could be linked or referenced in these policies. If it is not, ideally it would be co-created with community members and community-based organizations to ensure its relevance and effectiveness.
- Many jurisdictions in the Bay Area are increasingly using the "public participation spectrum" as a reference point for engaging community. The spectrum describes public participation efforts that passively "inform" to ones that "empower" through community-led decision-making. It may be useful to reference this spectrum and denote the relationship between the approaches outlined in BCDC policies and this spectrum framework. Some of the language in the proposed policies reflects a "consult" approach and other sections reflect "collaborate." This may be intentional, but it might be useful to calibrate the approach across different sections of the policy. For example, the reference to Native American communities is described as acknowledgement, which is even more passive engagement than "inform," but other sections reflect input into decision-making. It would be useful to give reasoning for the different levels of community impact on decision-making recommended in these policies, if possible, so that these distinctions can be made transparent and well-understood. If the spectrum were referenced, the role of community in decision-making could be maximized, and public participation efforts designed to, for example, "inform," could be presented as such, to increase transparency and foster trust over time.

Thank you for the opportunity to participate (and your follow-up!).

Best,
Sarah

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Alameda County
SUSTAINABILITY
Local Action, Global Impact.

From: "Choo, Chris" <CChoo@marincounty.org>
Date: Tuesday, July 9, 2019 at 5:54 PM
To: "Bennett, Clesi@BCDC" <clesi.bennett@bcdc.ca.gov>
Subject: RE: Questions on BCDC's proposed EJ policies?

Hi Clesi,

Great job pulling this work together. I commend your time researching and compiling this information. The resulting staff report on the issues is comprehensive and very well done. Overall, I think this outlines the history, impacts, and issues well, but would encourage more resources like maps to demonstrate areas of concern and areas of existing coastal resources for recreation and access. I realize this can be a large undertaking, so it could be quickly done using existing resources like local, regional, state, and federal parks websites, the Bay Area Water Trail or the San Francisco privately-owned public space website. These sites show where access and public spaces exist and give example of designs that could be used to develop an engagement effort with communities.

I think it would also be beneficial to identify a process for project proponents to follow to address the public access, shoreline protection, and mitigation policies. The language is somewhat open-ended and could add years and substantial cost to a project. I realize the scale of some of the projects that come before BCDC are backed by those who have the resources to make communities significantly better, but I also know that it can be challenging to reach consensus on any project. Policies should also recognize private vs. public-funded efforts differently regarding the level of mitigation required. For public projects, money would have to be identified up front and the design would require steps towards meeting the goals of these policies during project development and not once the permits are submitted. Maintenance or repair projects could be left undone, threatening other aspects of community wellbeing if compensatory mitigation is required. It would certainly be a challenge for public agencies' budgets. It would be good to identify a stepwise process as part of the adoption of these policies to help guide expectations for everyone involved.

I hope my comments are helpful. Please feel free to reach out with any questions and congratulations again!

COUNTY OF MARIN

Chris Choo
PRINCIPAL WATERSHED PLANNER

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From: Claire Griffing <cgriffing@albanyca.org>
Sent: Friday, June 28, 2019 4:14 PM
To: Bennett, Clesi@BCDC
Subject: RE: Questions on BCDC's proposed EJ policies?

Hi Clesi,
Thanks for sending this along! Overall, this looks like a fantastic document, and we're excited to see BCDC take this on as an important priority for the region. A few minor comments:

1. This sentence on page 7 and page 15 seems to be missing a word – it doesn't read quite right: "Ensure that the needs of vulnerable shoreline communities are addressed as the Commission assists all stakeholders plan for current and future climate hazards."
    a. Suggestions:
        i. Top choice: When the Commission assists all stakeholders in planning for current and future climate hazards, ensure that the needs of vulnerable shoreline communities are addressed.
        ii. Ensure that the needs of vulnerable shoreline communities are addressed as the Commission assists all stakeholders in planning for current and future climate hazards.
        iii. Ensure that the needs of vulnerable shoreline communities are addressed as the Commission assists all stakeholders to plan for current and future climate hazards.
2. Policy 1 on page 17: Since addressing issues of environmental justice and social equity should begin as early as possible in the project planning process, the Commission should support, encourage, and expect local governments to include environmental justice and social equity in their general plans, zoning ordinances, and in their discretionary approval processes. Additionally, the Commission should be a leader in collaborating transparently with other agencies on issues related to environmental justice and social equity that fall outside of the Commission's authority or jurisdiction.
    a. How is the Commission going to "support, encourage, and expect local governments" to do this? This needs more specificity. Are there requirements for amendments to these planning documents? Will the Commission provide template language? If so, that should be stated. It should also be clarified that the Commission does not have jurisdictional authority over local governments, and that the Commission hopes to support/encourage (perhaps not expect) that local governments do this through outreach, template language, etc.
3. Local governments and project applicants should be encouraged and expected to conduct equitable, culturally-relevant community outreach and engagement to meaningfully involve potentially impacted communities for major projects and appropriate minor projects in identified vulnerable or disadvantaged communities, and such outreach and engagement should continue throughout the Commission review and permitting processes. Evidence of how community concerns were addressed should be provided. If previous outreach and engagement were insufficient, further outreach and engagement should be conducted prior to Commission action.

a. Is there a way to define impacted communities? Is there a distance from a project site, perhaps? How does a jurisdiction determine this early on in the process? I ask because we're very small and I am curious whether this would include populations outside of our jurisdiction (which would be a bit unprecedented for in-jurisdiction planning processes).

Thanks for sharing!

Thanks,

Claire Griffing
Sustainability & Resilience Manager | PIO
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