

COMMENT #1

From: Mark Harnett <mharnett@gmail.com>
Sent: Tuesday, September 17, 2024 1:05 PM
To: BCDC PublicComment <publiccomment@bcdcc.ca.gov>
Subject: RSAP

- The plan is very detailed.
- I didn't see a lot of discussion as to how the cost effectiveness of the different measures is taken into account in decisions as to what projects to take on.
- I think that at the high end of the rise (6-11 ft+), a LOT of infrastructure (101, SFO, El Camino) will become inundated.. and it will be VERY expensive.
- How would you use your framework to evaluate a fairly radical solution such as damming the Golden Gate and using pumps and locks to control the water level of the resulting below sea level reservoir? Has this solution been evaluated at all?

Mark Harnett
Belmont , Ca
(350 ft above sea level)

COMMENT #2

From: Carole Gonsalves (carolejg@mac.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Monday, September 23, 2024 2:22 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Public Comment - RSAP

Dear BCDC Commissioners,

Dear Bay Conservation and Development Commissioners,

Sea level rise poses an undeniable threat to the Bay Area. The Regional Shoreline Adaptation Plan (RSAP) presents a crucial opportunity for coordinated regional action to bolster the resilience of our community and ecological assets against climate change.

San Francisco Bay's shoreline habitats are invaluable public assets. Beyond mitigating flood and storm surges, these ecosystems sequester carbon, filter pollution, and moderate temperatures - services that are vital for our region's health, safety, and ecological balance. As climate change worsens, they will become even more indispensable as our first, and arguably most cost-effective, defense against sea level rise.

As you finalize the RSAP, I urge you to champion the following strategies.

1. Make the most of nature's resiliency tools. Prioritize restoration efforts and preservation of critical lands for habitat migration, aligned with the San Francisco Bay Joint Venture's habitat goals. Deploy nature-based strategies wherever feasible to maintain biodiversity and leverage natural resilience, providing sustainable and cost-effective solutions that naturally adapt with changing conditions over time.
 2. Level the playing field. Address the disproportionate impacts of sea level rise on disadvantaged and under-resourced communities. Advance environmental justice by ensuring robust community representation in decision making and prioritizing the identification, cleanup and maintenance of toxic sites vulnerable to sea and groundwater rise. Foster region-wide collaboration to empower vulnerable communities and promote equitable outcomes.
 3. Create phased, adaptive resiliency pathways. Require sub-regional RSAP plans to adopt phased approaches to sea level rise adaptation. These pathways should facilitate smooth transitions between strategies as conditions evolve, employing nature-based measures first, wherever feasible.
- A successful RSAP must safeguard both community wellbeing and the ecological health of Bay. By integrating the above strategies into the RSAP, we can ensure a resilient future for all.

Sincerely,

Carole Gonsalves

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #3

From: Douglas McCormick (mfiinsure@cox.net) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, September 24, 2024 9:42 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Public Comment - RSAP

Dear BCDC Commissioners,

Dear Bay Conservation and Development Commissioners,

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Sincerely,

Douglas McCormick

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COMMENT #4

From: Mark Cappetta (Mark@gsambc.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, September 24, 2024 9:52 AM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Public Comment - RSAP

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Sincerely,

Mark Cappetta

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COMMENT #5

From: B Sandow (bysandow@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, September 24, 2024 9:52 AM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Public Comment - RSAP

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Sincerely,
B Sandow

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COMMENT #6

From: Joslyn Baxter (joslyn.baxter@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, September 24, 2024 9:55 AM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Public Comment - RSAP

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Sincerely,
Joslyn Baxter

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COMMENT #7

From: Artyhur Feinstein (arthurfeinstein@earthlink.net) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, September 24, 2024 9:56 AM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Public Comment - RSAP

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Sincerely,
Arthur Feinstein

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COMMENT #8

From: Lorenzo Bavoso (bavoso@att.net) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Tuesday, September 24, 2024 9:57 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Public Comment - RSAP

Dear BCDC Commissioners,

The responsibility for the health of the Bay falls on all of us. As an avid and committed sportsman subject to multiple regulatory agency oversight, I consider it my privilege to comply with regulations and oversight. I expect you to have the same mindset and not act to sabotage those controls.

Dear Bay Conservation and Development Commissioners,

Sea level rise poses an undeniable threat to the Bay Area. The Regional Shoreline Adaptation Plan (RSAP) presents a crucial opportunity for coordinated regional action to bolster the resilience of our community and ecological assets against climate change.

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Sincerely,

Lorenzo Bavoso

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COMMENT #9

From: Heather Guillen (heatherbethguillen@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, September 24, 2024 9:58 AM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Public Comment - RSAP

Dear BCDC Commissioners,

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Sincerely,
Heather Guillen

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COMMENT #10

From: Sam Butler (samjbutler@sbcglobal.net) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, September 24, 2024 10:01 AM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Public Comment - RSAP

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Sincerely,
Sam Butler

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COMMENT #11

From: Kellie Miller (kamiller@precisionboard.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, September 24, 2024 10:26 AM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Public Comment - RSAP

Dear BCDC Commissioners,

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Sincerely,

Kellie Miller

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COMMENT #12

From: Claire Broome (cvbroome@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, September 24, 2024 10:29 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Public Comment - RSAP

Dear BCDC Commissioners,

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Sincerely,

Claire Broome

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COMMENT #13

From: Howard Cohen (howard@cohensw.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, September 24, 2024 10:32 AM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Public Comment - RSAP

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Sincerely,
Howard Cohen

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COMMENT #14

From: Karen Kirschling (kumasong@icloud.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, September 24, 2024 10:48 AM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Public Comment - RSAP

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Sincerely,
Karen Kirschling

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COMMENT #15

From: Lyda Eddington (allegroarts@yahoo.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, September 24, 2024 10:53 AM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Public Comment - RSAP

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Sincerely,
Lyda Eddington

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COMMENT #16

From: Irene Hilgers (irenehilgers@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>

Sent: Tuesday, September 24, 2024 10:58 AM

To: BCDC PublicComment <publiccomment@bcdc.ca.gov>

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1. Make the most of nature's resiliency tools. Prioritize restoration efforts and preservation of critical lands for habitat migration, aligned with the San Francisco Bay Joint Venture's habitat goals. Deploy nature-based strategies wherever feasible to maintain biodiversity and leverage natural resilience, providing sustainable and cost-effective solutions that naturally adapt with changing conditions over time.
2. Level the playing field. Address the disproportionate impacts of sea level rise on disadvantaged and under-resourced communities. Advance environmental justice by ensuring robust community representation in decision making and prioritizing the identification, cleanup and maintenance of toxic sites vulnerable to sea and groundwater rise. Foster region-wide collaboration to empower vulnerable communities and promote equitable outcomes.
3. Create phased, adaptive resiliency pathways. Require sub-regional RSAP plans to adopt phased approaches to sea level rise adaptation. These pathways should facilitate smooth transitions between strategies as conditions evolve, employing nature-based measures first, wherever feasible.

A successful RSAP must safeguard both community wellbeing and the ecological health of Bay. By integrating the above strategies into the RSAP, we can ensure a resilient future for all.

Sincerely,
Irene Hilgers

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #17

From: Dalia Salgado (adthdfyr@aol.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, September 24, 2024 11:05 AM

To: BCDC PublicComment <publiccomment@bcdc.ca.gov>

Subject: Public Comment - RSAP

Dear BCDC Commissioners,

Dear Bay Conservation and Development Commissioners,

Sea level rise poses an undeniable threat to the Bay Area. The Regional Shoreline Adaptation Plan (RSAP) presents a crucial opportunity for coordinated regional action to bolster the resilience of our community and ecological assets against climate change.

San Francisco Bay's shoreline habitats are invaluable public assets. Beyond mitigating flood and storm surges, these ecosystems sequester carbon, filter pollution, and moderate temperatures - services that are vital for our region's health, safety, and ecological balance. As climate change worsens, they will become even more indispensable as our first, and arguably most cost-effective, defense against sea level rise.

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Sincerely,

Dalia Salgado

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #18

From: Sandra Gamble (sl.gamble@aol.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, September 24, 2024 1:11 PM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Public Comment - RSAP

Dear BCDC Commissioners,

Dear Bay Conservation and Development Commissioners,

Sea level rise poses an undeniable threat to the Bay Area. The Regional Shoreline Adaptation Plan (RSAP) presents a crucial opportunity for coordinated regional action to bolster the resilience of our community and ecological assets against climate change.

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Sincerely,
Sandra Gamble

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #19

From: Querido Galdo (querido@queridomundo.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, September 24, 2024 1:27 PM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Public Comment - RSAP

Dear BCDC Commissioners,

Dear Bay Conservation and Development Commissioners,

Sea level rise poses an undeniable threat to the Bay Area. The Regional Shoreline Adaptation Plan (RSAP) presents a crucial opportunity for coordinated regional action to bolster the resilience of our community and ecological assets against climate change.

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Sincerely,
Querido Galdo

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COMMENT #20

From: Joy Baker (joydbaker@sbcglobal.net) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, September 24, 2024 1:32 PM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Public Comment - RSAP

Dear BCDC Commissioners,

Dear Bay Conservation and Development Commissioners,

Sea level rise poses an undeniable threat to the Bay Area. The Regional Shoreline Adaptation Plan (RSAP) presents a crucial opportunity for coordinated regional action to bolster the resilience of our community and ecological assets against climate change.

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Sincerely,
Joy Baker

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COMMENT #21

From: Elizabeth Ramsey (betsyr112@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, September 24, 2024 3:00 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Public Comment - RSAP

Dear BCDC Commissioners,

Dear Bay Conservation and Development Commissioners,

Sea level rise poses an undeniable threat to the Bay Area. The Regional Shoreline Adaptation Plan (RSAP) presents a crucial opportunity for coordinated regional action to bolster the resilience of our community and ecological assets against climate change.

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Sincerely,
Elizabeth Ramsey

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #22

From: A.J. Averett (AJAverett@hotmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, September 24, 2024 3:12 PM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Public Comment - RSAP

Dear BCDC Commissioners,

Dear Bay Conservation and Development Commissioners,

Sea level rise poses an undeniable threat to the Bay Area. The Regional Shoreline Adaptation Plan (RSAP) presents a crucial opportunity for coordinated regional action to bolster the resilience of our community and ecological assets against climate change.

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Sincerely,

A.J. Averett

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COMMENT #23

From: Mary Stanistreet (mkstanistreet@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, September 24, 2024 3:25 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Public Comment - RSAP

Dear BCDC Commissioners,

Dear Bay Conservation and Development Commissioners,

Sea level rise poses an undeniable threat to the Bay Area. The Regional Shoreline Adaptation Plan (RSAP) presents a crucial opportunity for coordinated regional action to bolster the resilience of our community and ecological assets against climate change.

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Sincerely,

Mary Stanistreet

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COMMENT #24

From: Margaret Phelps (margaretphelps@msn.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, September 24, 2024 3:26 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Public Comment - RSAP

Dear BCDC Commissioners,

Dear Bay Conservation and Development Commissioners,

Sea level rise poses an undeniable threat to the Bay Area. The Regional Shoreline Adaptation Plan (RSAP) presents a crucial opportunity for coordinated regional action to bolster the resilience of our community and ecological assets against climate change.

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Sincerely,

Margaret Phelps

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #25

From: Arlene Van Craeynest (acvancaeynest@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>

Sent: Tuesday, September 24, 2024 4:28 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Public Comment - RSAP

Dear BCDC Commissioners,

Dear Bay Conservation and Development Commissioners,

Sea level rise poses an undeniable threat to the Bay Area. The Regional Shoreline Adaptation Plan (RSAP) presents a crucial opportunity for coordinated regional action to bolster the resilience of our community and ecological assets against climate change.

San Francisco Bay's shoreline habitats are invaluable public assets. Beyond mitigating flood and storm surges, these ecosystems sequester carbon, filter pollution, and moderate temperatures - services that are vital for our region's health, safety, and ecological balance. As climate change worsens, they will become even more indispensable as our first, and arguably most cost-effective, defense against sea level rise.

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Sincerely,

Arlene Van Craeynest

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #26

From: Mark Armstrong (docarmstrong006@hotmail.com) Sent You a Personal Message <kwautomail@phone2action.com>

Sent: Tuesday, September 24, 2024 5:40 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Public Comment - RSAP

Dear BCDC Commissioners,

For our future for us all

Dear Bay Conservation and Development Commissioners,

Sea level rise poses an undeniable threat to the Bay Area. The Regional Shoreline Adaptation Plan (RSAP) presents a crucial opportunity for coordinated regional action to bolster the resilience of our community and ecological assets against climate change.

San Francisco Bay's shoreline habitats are invaluable public assets. Beyond mitigating flood and storm surges, these ecosystems sequester carbon, filter pollution, and moderate temperatures - services that are vital for our region's health, safety, and ecological balance. As climate change worsens, they will become even more indispensable as our first, and arguably most cost-effective, defense against sea level rise.

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Sincerely,

Mark Armstrong

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COMMENT #27

From: bob nace (robertnace37@outlook.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Wednesday, September 25, 2024 3:09 AM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Public Comment - RSAP

Dear BCDC Commissioners,

Dear Bay Conservation and Development Commissioners,

Sea level rise poses an undeniable threat to the Bay Area. The Regional Shoreline Adaptation Plan (RSAP) presents a crucial opportunity for coordinated regional action to bolster the resilience of our community and ecological assets against climate change.

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Sincerely,
bob nace

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #28

From: Davin Peterson (davinsemail@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Wednesday, September 25, 2024 8:16 AM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Public Comment - RSAP

Dear BCDC Commissioners,

Dear Bay Conservation and Development Commissioners,

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Sincerely,

Davin Peterson

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COMMENT #29

From: Denise Churchill (denisechurch@aol.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Friday, September 27, 2024 9:52 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Public Comment - RSAP

Dear BCDC Commissioners,

It is imperative that the Clean Water Act is not ignored. We have a responsibility to act in a manner that will protect our water ways for centuries to come. Pollution is a killer, we must do our due diligence.

Dear Bay Conservation and Development Commissioners,

Sea level rise poses an undeniable threat to the Bay Area. The Regional Shoreline Adaptation Plan (RSAP) presents a crucial opportunity for coordinated regional action to bolster the resilience of our community and ecological assets against climate change.

San Francisco Bay's shoreline habitats are invaluable public assets. Beyond mitigating flood and storm surges, these ecosystems sequester carbon, filter pollution, and moderate temperatures - services that are vital for our region's health, safety, and ecological balance. As climate change worsens, they will become even more indispensable as our first, and arguably most cost-effective, defense against sea level rise.

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Sincerely,

Denise Churchill

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #30

From: Evan Adams <evanandrewadams@gmail.com>

Sent: Saturday, September 28, 2024 11:40 AM

To: BCDC PublicComment <publiccomment@bcdc.ca.gov>

Subject: Design Review Board Meeting Notice October 7th: Regional Shoreline Adaptation Plan (RSAP)

I remain concerned that the Draft document is not using updated sea level maps and data. For example, Foster City recently completed almost a \$100M levee around the entire city. Yet this bay adapt plan does not show the effect of that work and still lists Foster City in a 100year flood plan.

This project is a moving target and using data from 2017 and 2021 is now very much outdated.

--

Evan Adams

COMMENT #31

From: Freda Hofland (towildwood@aol.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Saturday, September 28, 2024 7:42 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Public Comment - RSAP

Dear BCDC Commissioners,

Dear Bay Conservation and Development Commissioners,

Sea level rise poses an undeniable threat to the Bay Area. The Regional Shoreline Adaptation Plan (RSAP) presents a crucial opportunity for coordinated regional action to bolster the resilience of our community and ecological assets against climate change.

San Francisco Bay's shoreline habitats are invaluable public assets. Beyond mitigating flood and storm surges, these ecosystems sequester carbon, filter pollution, and moderate temperatures - services that are vital for our region's health, safety, and ecological balance. As climate change worsens, they will become even more indispensable as our first, and arguably most cost-effective, defense against sea level rise.

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1. Make the most of nature's resiliency tools. Prioritize restoration efforts and preservation of critical lands for habitat migration, aligned with the San Francisco Bay Joint Venture's habitat goals. Deploy natur

Sincerely,

Freda Hofland

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #32

From: Barbara Eckart (barbaraphr@yahoo.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Sunday, September 29, 2024 12:03 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Public Comment - RSAP

Dear BCDC Commissioners,

We need to protect our scarce natural resources. We cannot continue to pollute our air and water. We need to think about our children and their future. Stop the lawsuit against the EPA this agency protects us.

Dear Bay Conservation and Development Commissioners,

Sea level rise poses an undeniable threat to the Bay Area. The Regional Shoreline Adaptation Plan (RSAP) presents a crucial opportunity for coordinated regional action to bolster the resilience of our community and ecological assets against climate change.

San Francisco Bay's shoreline habitats are invaluable public assets. Beyond mitigating flood and storm surges, these ecosystems sequester carbon, filter pollution, and moderate temperatures - services that are vital for our region's health, safety, and ecological balance. As climate change worsens, they will become even more indispensable as our first, and arguably most cost-effective, defense against sea level rise.

As you finalize the RSAP, I urge you to champion the following strategies.

1. Make the most of nature's resiliency tools. Prioritize restoration efforts and preservation of critical lands for habitat migration, aligned with the San Francisco Bay Joint Venture's habitat goals. Deploy nature-based strategies wherever feasible to maintain biodiversity and leverage natural resilience, providing sustainable and cost-effective solutions that naturally adapt with changing conditions over time.
2. Level the playing field. Address the disproportionate impacts of sea level rise on disadvantaged and under-resourced communities. Advance environmental justice by ensuring robust community representation in decision making and prioritizing the identification, cleanup and maintenance of toxic sites vulnerable to sea and groundwater rise. Foster region-wide collaboration to empower vulnerable communities and promote equitable outcomes.
3. Create phased, adaptive resiliency pathways. Require sub-regional RSAP plans to adopt phased approaches to sea level rise adaptation. These pathways should facilitate smooth transitions between strategies as conditions evolve, employing nature-based measures first, wherever feasible.

A successful RSAP must safeguard both community wellbeing and the ecological health of Bay. By integrating the above strategies into the RSAP, we can ensure a resilient future for all.

Sincerely,
Barbara Eckart

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #33

From: Mary Cousins <mcousins@bacwa.org>

Sent: Tuesday, September 17, 2024 11:44 AM

To: Hallenbeck, Todd@BCDC <todd.hallenbeck@bcdc.ca.gov>

Cc: Perrin-Martinez, Jaclyn@BCDC <jaclyn.perrin-martinez@bcdc.ca.gov>

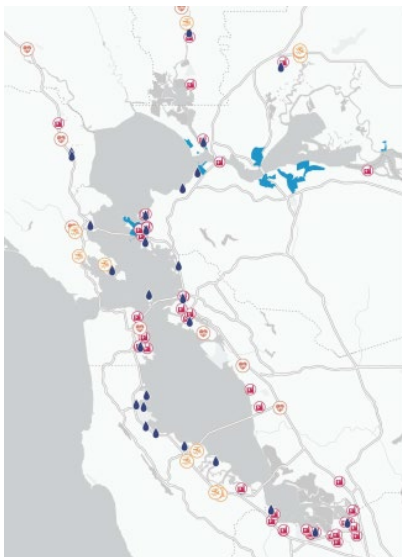
Subject: POTWs missing / what is "CalEPA 2023"?

Hi Todd,

I work for the Bay Area Clean Water Agencies (BACWA) and I am reaching out regarding the GIS mapping being conducted to support the RSAP. I'm so grateful that you have already created the version that was shared with the RSAP – it's very helpful to see a mockup!

The publicly owned treatment works (POTWs) shown in Figure 2-11 (snip below) seem to have a few omissions, and thanks to your mockup of the GIS system, I can see the source of the problem. The "Publicly Owned Wastewater Treatment Works" layer is missing several POTWs (Hayward, Richmond, San Leandro). This is likely a database error because those facilities do not have their own discharge permits, so the CalEPA doesn't have them listed separately in their database. Your layer also includes extraneous non-POTW locations, including private businesses, that should be removed before this goes live. At least one plant is in the wrong location (Novato; the plant moved). I keep seeing references to "CalEPA 2023" to support this figure, but neither the RSAP nor [RSAP Guidelines Appendix: Data Sources and Analytical Methodology \(bayadapt.org\)](#) includes a complete reference.

Could you please provide me with a reference to the CalEPA 2023 database? This might help me figure out why this layer is not providing you with the correct information – including extraneous facilities and omitting ones that should be included. If there is a way to get an Excel version of that list, that might be helpful too. I would love to work with you to make sure that this gets updated before the mapping is finalizing.



Thanks!

Mary Cousins, Ph.D., P.E.

Regulatory Program Manager

Bay Area Clean Water Agencies

mcousins@bacwa.org

(510) 761-6420

COMMENT #34

From: Ku, Jennifer <jennifer.ku@ebmud.com>

Sent: Monday, September 30, 2024 9:16 AM

To: Hallenbeck, Todd@BCDC <todd.hallenbeck@bcdca.gov>

Subject: RSAP Publicly Owned Wastewater Treatment Works data

Hi Todd,

I had some comments and questions regarding the GIS data used for the Regional Shoreline Adaptation Plan specifically for the Critical Infrastructure and Services, Publicly Owned Wastewater Treatment Works.

1. How was the data acquired? I found a number of locations that do not appear applicable for this layer. Within my agency's wastewater service area (<https://www.ebmud.com/about-us/who-we-are/service-area>) it looks like some the locations were based off a permit (with addresses associated with a city's City Hall or Public Works Department) rather than a physical structure in a city. There are also a number of facilities that appear to be privately owned companies that had some enforcement action against them shown. EBMUD's water treatment facilities are also shown on the GIS map, but they do not treat wastewater.
2. I found a point location with two different names for the EBMUD Wastewater Treatment Plant in Oakland (2020 Wake Ave, Oakland). One point is "EBMUD SD1 Main WWTP" which is correct. The other point is labeled "Point Isabel WWF" which is in Richmond, not Oakland. I also noticed some fellow wastewater treatment plants missing from the map. I recommend using <https://baywise.org/map/> created by the Bay Area Clean Water Agencies (BACWA) for a list of wastewater treatment plants around the Bay Area. BACWA staff recently updated this map utilizing input from all the wastewater agencies in the Bay Area.
3. How was it determined which locations would be placed under Strategic Regional Priorities?

Thank you,

Jennifer Ku, P.E. (she/her) | Associate Civil Engineer | Wastewater Planning
East Bay Municipal Utility District | 375 11th Street, MS 702 | Oakland, CA 94607
Phone: (510) 287-1681 | jennifer.ku@ebmud.com

COMMENT #35

From: Sharon Hagen (sjhagen@sbcglobal.net) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Wednesday, October 2, 2024 11:32 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Public Comment - RSAP

Dear BCDC Commissioners,

I have lived in San Francisco most of my life and am ashamed that San Francisco is responsible for so much pollution and raw sewage in the bay. I urge you to respect the Clean Water Act and to work with the EPA to clean up our bay!

Dear Bay Conservation and Development Commissioners,

Sea level rise poses an undeniable threat to the Bay Area. The Regional Shoreline Adaptation Plan (RSAP) presents a crucial opportunity for coordinated regional action to bolster the resilience of our community and ecological assets against climate change.

San Francisco Bay's shoreline habitats are invaluable public assets. Beyond mitigating flood and storm surges, these ecosystems sequester carbon, filter pollution, and moderate temperatures - services that are vital for our region's health, safety, and ecological balance. As climate change worsens, they will become even more indispensable as our first, and arguably most cost-effective, defense against sea level rise.

As you finalize the RSAP, I urge you to champion the following strategies.

1. Make the most of nature's resiliency tools. Prioritize restoration efforts and preservation of critical lands for habitat migration, aligned with the San Francisco Bay Joint Venture's habitat goals. Deploy nature-based strategies wherever feasible to maintain biodiversity and leverage natural resilience, providing sustainable and cost-effective solutions that naturally adapt with changing conditions over time.
2. Level the playing field. Address the disproportionate impacts of sea level rise on disadvantaged and under-resourced communities. Advance environmental justice by ensuring robust community representation in decision making and prioritizing the identification, cleanup and maintenance of toxic sites vulnerable to sea and groundwater rise. Foster region-wide collaboration to empower vulnerable communities and promote equitable outcomes.
3. Create phased, adaptive resiliency pathways. Require sub-regional RSAP plans to adopt phased approaches to sea level rise adaptation. These pathways should facilitate smooth transitions between strategies as conditions evolve, employing nature-based measures first, wherever feasible.

A successful RSAP must safeguard both community wellbeing and the ecological health of Bay. By integrating the above strategies into the RSAP, we can ensure a resilient future for all.

Sincerely,

Sharon Hagen

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #36



October 4, 2024

Jaclyn Perrin-Martinez
Senior Climate Adaptation Planner
San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, California 94105

Subject: MTC/Bay Trail Comments on the Draft Regional Shoreline Adaptation Plan (RSAP)

Dear Jaclyn Perrin-Martinez:

On behalf of the San Francisco Bay Trail, I am writing to submit comments on the draft Regional Shoreline Adaptation Plan (RSAP) that the San Francisco Bay Conservation and Development Commission (BCDC) released on September 16, 2024. The Bay Trail is a planned 500-mile continuous network of multi-use bicycling and walking paths that, when complete, will encircle San Francisco and San Pablo Bays in their entirety. The Bay Trail provides public access to the shoreline of all nine Bay Area counties, as well as 47 cities. To date, over 350 miles of the proposed Bay Trail system have been developed.

The Bay Trail enthusiastically supports the draft RSAP and look forward to continued coordination with BCDC and local partners as they develop their subregional plans. The Bay Trail has the following comments on the draft RSAP:

- General process comment: The Bay Trail Project kindly requests that BCDC staff notify the Bay Trail team when a new subregional plan begins their coordination with BCDC. This will ensure that the Bay Trail team is engaged from the start of the planning process.
- Page 67: We kindly request that the “Local trails, bicycle, and pedestrian routes” assets move to the "Required to assess" category. People rely on bicycle and pedestrian facilities to access transit, especially people in transit-dependent communities. Failing to assess the active transportation network in conjunction with the transit network would be a serious error in judgement for transportation planning and analyses. The Metropolitan Transportation Commission’s (MTC) [Regional Active Transportation Network](#) is a potential asset to add to the list.

- Pages 62-65: We support the inclusion of the Bay Trail in the Strategic Regional Priorities (SRPs) as “Connected Regional Shoreline Access,” which is described in subsection 2.3.5 Public Access and Recreation. The Bay Trail is the primary public access route along the Bay, and we greatly appreciate BCDC’s continued support of this critical community asset.
- Page 63: We request a minor edit: in the first bullet point in the sidebar, please capitalize the word “Trail” after “Bay” -- it should read as “Bay Trail” not “Bay trail.”
- Page 65: We kindly request a minor edit to the last sentence of the paragraph at the top of the page: “Investing in public access can be coupled with flood risk reduction [and bay restoration improvements] to maintain and enhance important connections to and along the Bay shoreline, ensure access to the water as sea levels rise, [and improve healthy Baylands ecosystems].” Please add “and bay restoration improvements” and “and improve healthy Baylands ecosystems” to the last sentence of the paragraph at the top of page 65. It is critical to consider restoration improvements with new or improved public access projects as multi-benefit projects. These improvements assist other Strategic Regional Priorities (SRPs) such as Connected and Complete Ecosystems.
- The RSAP Data Preview references the 2019 Regional Bikeway Network. In Summer 2022, MTC adopted the Regional Active Transportation Network, which is an updated active transportation and bikeways network. Please contact MTC to request the 2022 data layers.
- The RSAP Data Preview references outdated Bay Trail GIS data (2023) for the Existing Conditions layer. Please contact MTC/Bay Trail staff to request the latest Bay Trail Gap Closure Implementation Plan (BTGICP) and/or Fieldwork Review 2024 data layers.

The Bay Trail appreciates the opportunity to comment on the draft Regional Shoreline Adaptation Plan (RSAP) to continue to improve the Bay Trail and public access to the Bay shoreline. Please feel free to contact me at ddohm@bayareametro.gov or (415) 778-4429 if you have any questions regarding the above comments or the Bay Trail.

Sincerely,

DocuSigned by:

745A0339620C459...

Diane Dohm
MTC/Bay Trail Planner

COMMENT #37

From: Tia Triplett (tia@anlf.com) Sent You a Personal Message [<kwautomail@phone2action.com>](mailto:kwautomail@phone2action.com)

Sent: Friday, October 4, 2024 1:58 PM

To: BCDC PublicComment [<publiccomment@bccdc.ca.gov>](mailto:publiccomment@bccdc.ca.gov)

Subject: Public Comment - RSAP

Dear BCDC Commissioners,

Dear Bay Conservation and Development Commissioners,

Sea level rise poses an undeniable threat to the Bay Area. The Regional Shoreline Adaptation Plan (RSAP) presents a crucial opportunity for coordinated regional action to bolster the resilience of our community and ecological assets against climate change.

San Francisco Bay's shoreline habitats are invaluable public assets. Beyond mitigating flood and storm surges, these ecosystems sequester carbon, filter pollution, and moderate temperatures - services that are vital for our region's health, safety, and ecological balance. As climate change worsens, they will become even more indispensable as our first, and arguably most cost-effective, defense against sea level rise.

As you finalize the RSAP, I urge you to champion the following strategies.

1. Make the most of nature's resiliency tools. Prioritize restoration efforts and preservation of critical lands for habitat migration, aligned with the San Francisco Bay Joint Venture's habitat goals. Deploy nature-based strategies wherever feasible to maintain biodiversity and leverage natural resilience, providing sustainable and cost-effective solutions that naturally adapt with changing conditions over time.

2. Level the playing field. Address the disproportionate impacts of sea level rise on disadvantaged and under-resourced communities. Advance environmental justice by ensuring robust community representation in decision making and prioritizing the identification, cleanup and maintenance of toxic sites vulnerable to sea and groundwater rise. Foster region-wide collaboration to empower vulnerable communities and promote equitable outcomes.

3. Create phased, adaptive resiliency pathways. Require sub-regional RSAP plans to adopt phased approaches to sea level rise adaptation. These pathways should facilitate smooth transitions between strategies as conditions evolve, employing nature-based measures first, wherever feasible.

A successful RSAP must safeguard both community wellbeing and the ecological health of Bay. By integrating the above strategies into the RSAP, we can ensure a resilient future for all.

Sincerely,

Tia Triplett

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #38

PDF - The Amah Mutsun Tribal Band of San Juan Bautista



**The Amah Mutsun Tribal Band of San Juan Bautista
&
A.M.T.B. Inc.**

Letter of Response

To whom it may concern:

It is our pride and privilege to be of service for any Native American Cultural Resource Monitoring, Consulting and/ or Sensitivity Training you may need or require. We take our Heritage and History seriously and are diligent about preserving as much of it as we can. Construction is a constant in the Bay Area and with that new discoveries are bound to happen. If you choose our services, we will gladly guide all personnel through proper procedures to safely protect and preserve: Culture, Heritage, and History.

It is highly recommended, if not previously done, to search through Sacred Lands Files (SLF) and California Historical Resource Information Systems (CHRIS) as well as reaching out to the Native American Heritage Commission (NAHC) In order to determine whether you are working in a Cultural and/ or Historic sensitivity.

If you have received any positive cultural or historic sensitivity within 1 mile of the project area here are A.M.T.B Inc's and Amah Mutsun Tribal Band of San Juan Bautista's recommendations:

- All Crews, Individuals and Personnel who will be moving any earth be Cultural Sensitivity Trained.
- A Qualified California Trained Archaeological Monitor is present during any earth movement.
- A Qualified Native American Monitor is present during any earth movement.

If further Consultation, Monitoring or Sensitivity Training is needed please feel free to contact A.M.T.B. Inc. or Myself Directly. A.M.T.B. Inc. 650 851 7747

Irenne Zwiierlein

Irenne Zwiierlein



3030 Soda Bay Road, Lakeport
CA 95453
amtbinc21@gmail.com
(650)851-7447

**Amah Mutsun Tribal Band of San Juan Bautista
&
AMTB Inc.**

3030 Soda Bay Road Lakeport, CA 95453

Our rates for 2024 are

\$275.00 per hour.

4 hours minimum

Cancellations not 48 hours (about 2 days) prior will be charged as a 4-hour minimum. There is a round trip mileage charge if canceled after they have traveled to site.

Anything over 8 hours a day is charged as time and a half.

Weekends are charged at time and a half.

Holidays are charged at double the time.

For fiscal year (FY) 2024, standard per diem rate of \$412. (\$333. lodging, \$79 M&IE).

M&IE Breakdown FY 2023

M&IE Total¹	Continental Breakfast/ Breakfast²	Lunch²	Dinner²	Incidental Expenses	First & Last Day of Travel³
\$79.00	\$18.00	\$20.00	\$36.00	\$5.00	\$59.25

Beginning 2024, the standard mileage rates for the use of a car round trip (also vans, pickups or panel trucks) will be: \$.67 cents per mile driven for business use or what the current federal standard is at the time.

Our Payment terms are 5 days from date on invoice.

Our Monitors are Members of the Amah Mutsun Tribal Band of Mission San Juan Bautista.

If you have any questions, please feel free to contact the A.M.T.B. Inc. at the below contact information.

Sincerely,

Irenne Zwielerlein

Irenne Zwielerlein

3030 Soda Bay Rd, Lakeport
CA 95453
amtbin21@gmail.com
(650)851-7747



CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

11/29/2023

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Allied Brokers 591 Lytton Avenue Palo Alto CA 94301	CONTACT NAME: PHONE (A/C, No, Ext): (650) 328-1000 FAX (A/C, No): (650) 324-1142 E-MAIL: BusinessVIP@alliedbrokers.com ADDRESS:	
	INSURER(S) AFFORDING COVERAGE	
INSURED Amah Mutsun Tribal Band Consulting & Monitoring, LLC 330 Soda Bay Rd Lakeport CA 95453	INSURER A: Scottsdale Insurance Company NAIC # 41297	
	INSURER B: United States Liability Insurance Company 25895	
	INSURER C:	
	INSURER D:	
	INSURER E:	
	INSURER F:	

COVERAGES **CERTIFICATE NUMBER:** **REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSD	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC OTHER:			CPS7829150	07/09/2023	07/09/2024	EACH OCCURRENCE \$ 1,000,000 DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 100,000 MED EXP (Any one person) \$ 5,000 PERSONAL & ADV INJURY \$ 1,000,000 GENERAL AGGREGATE \$ 2,000,000 PRODUCTS - COMP/OP AGG \$ 1,000,000
	AUTOMOBILE LIABILITY <input type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS <input type="checkbox"/> NON-OWNED AUTOS ONLY						COMBINED SINGLE LIMIT (Ea accident) \$ BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE (Per accident) \$
	UMBRELLA LIAB <input type="checkbox"/> OCCUR EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE DED RETENTION \$						EACH OCCURRENCE \$ AGGREGATE \$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in Nh) If yes, describe under DESCRIPTION OF OPERATIONS below		N/A				<input type="checkbox"/> PER STATUTE <input type="checkbox"/> OTHER E.L. EACH ACCIDENT \$ E.L. DISEASE - EA EMPLOYEE \$ E.L. DISEASE - POLICY LIMIT \$
B	Professional Liability			SP1573468C	06/21/2023	06/21/2024	Each Claim \$1,000,000 Aggregate \$1,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

Proof of Coverage

CERTIFICATE HOLDER FOR YOUR INFORMATION	CANCELLATION SHOULD ANY OF THE ABOVE-DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.
	AUTHORIZED REPRESENTATIVE <i>Mimi Watson</i>

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Amah Mutsun Tribal Band of Mission San Juan Bautista

I, Irenne Zwierlein, am making the following formal Most Likely Descendant (MLD) Recommendations on behalf of the Amah Mutsun Tribal Band, with regards to the treatment of our ancestral remains and any and all associated grave regalia and subsurface features discovered at this location:

Expose, analyze in the field, and remove for reburial: A complete systematic collection and/or excavation by a professional archaeologist (who meets the Standards established by the Secretary of the Interior) of any exposed Native American skeletal remains should be coordinated. The collection and/or excavation should be undertaken using standard contemporary archaeological techniques. All archaeological field work will be managed daily on site by an archaeological field director who must possess the following qualifications: a graduate degree (MA) in archaeology, along with two years of full-time professional experience and specialized training in archaeological research, administration, and management; two years of supervised field and analytic experience in North American archaeology, and has demonstrated the ability to carry research to completion within assigned schedules. The project archaeologist or his/her staff will expose any burial and grave objects in my presence as the designated Most Likely Descendant, or my appointed representative (Monitor). Should the Native Monitor not be on-site, arrive late or depart early, all burial recovery work must stop. Likewise, any archaeological work where it is suspected that human remains might be discovered a Native Monitor must be present, or work may not be undertaken. Burials in various stages of excavation shall be protected overnight, by placing standard construction metal plates over them. A metal plate must be on-site before exposure begins.

1. Since our Tribe believes that our ancestral dead needs to be treated with utmost respect, and since our ancestral people had been disturbed in the past and more recently by bioturbation and construction/subsurface excavation activities, I am recommending that this ancestral person, and any future findings (i.e., isolates, burials and associated assemblages), be removed from their location/gravesite. And after appropriate analysis (presented below), be reburied as close to the original cemetery or discovery location as possible, as part of our honoring ceremony. If reburial for an on site location is not possible, we will consult with the Redwood City on a suitable alternative location, where a reburial honoring ceremony will be conducted. Reburial Site must be land that has no future intentions of being developed.
2. I am also recommending that the land owner enter into a contractual agreement with the Amah Mutsun Tribal Band Ohlone Tribe of the San Francisco Bay Area (DBA Amah Mutsun Tribal Band Ohlone Tribe, Inc.) for a Burial and Archaeological Data Recovery Program, monitoring services, and laboratory analysis of our ancestral remains which will include a full skeletal inventory of all

Amah Mutsun Tribal Band of Mission San Juan Bautista

of the skeletal elements, AMS dating, Stable Isotope analysis, ancient DNA, as well as any artifact and faunal analysis which shall be conducted by Basin Research. Should additional ancestral Native American remains be uncovered, the same recommended treatment will be in place for any additional discoveries.

3. The burial removal process should include, but not be limited to, the screening of any adjacent back dirt (spoils) piles located by these human remains, and the use of hand excavation methods to help remove any over burden (if necessary) down to a level to be determined in the field in order to facilitate full access to the in situ remains. The in situ remains will be exposed and removed by Amah Mutsun Tribal Band Ohlone field crew or in concert with on-site Archeological field personnel. These remains will be drawn and photographed in conjunction with on-site archaeological field staff who will document on standard archaeological excavation forms information about the burial remains and map in the grave and any subsurface features and/or artifacts. On-site Archeological field staff shall be responsible for mapping and recording the reburial location using GPS. Copies of the Reburial forms and Final Archaeological Report will be sent to Northwest Information Center, Sonoma State University, the Amah Mutsun Tribal Band Ohlone Tribe, and the Native American Heritage Commission.
4. It is also my recommendation that all of the human remains, associated artifacts, and ecofacts be brought to a suitable lab for cleaning and sorting, and preparation for detailed skeletal inventory and analysis which will include as stated above, be conducted by qualified specialists (approved by our Tribe) in their respective field(s). Selecting small samples of human bone for AMS dating, Stable Isotope and ancient DNA. The first two studies will require minimum funding within the proposed budget and will be conducted in collaboration with the Tribe's leadership and membership. Also, if conducive a Strontium study may also be considered. The results of all analysis will be presented first to the Amah Mutsun Tribal Band Ohlone Tribal leadership. If the results of these studies are of a positive nature and of scientific significance to our Tribe, then only with the Amah Mutsun Tribal Band Ohlone Tribe's written approval, will these results be published in the final report, otherwise will be held in confidentiality.
5. As part of this laboratory phase of work, I am also recommending that any isolated or complete burials be cleaned, and a complete skeletal inventory be conducted by the Amah Mutsun Tribal Band's staff Osteologist if available or by Basin Research Archaeological firm's osteological staff and associates. Any associated grave regalia and artifacts will also be cleaned, photographed, measured, and described. Amah Mutsun Tribal Band Ohlone Tribe and/or Basin Research Archaeologist and the Osteologist will each be responsible for writing a stand-alone final report that meets the standards under CEQA.

These recommendations follow our Tribe's desire to learn as much as possible about our ancestral heritage that has been denied to us by the dominant society and by archaeologists working on our ancestral heritage sites within our

Amah Mutsun Tribal Band of Mission San Juan Bautista

aboriginal and historic tribal territory. In this particular case, the ancestral person may indeed date back to what archaeologists have termed the Early Bay Period. Furthermore, given this recent discovery of our ancestral burial, I recommend bagging the skeletal elements, which has been done. We shall hand excavate within the immediate vicinity of the grave where these remains were found. After thorough investigation of the area, and confirmation that no more skeletal elements are present, mechanical excavation may proceed, slowly, with shallow passes of a flat blade 2-foot bucket. An Amah Mutsun Tribal Band Native American Monitor will be required to monitor this work. Amah Mutsun Tribal Band MLD Recommendations in the event that after further investigation by hand excavating a full burial has been discovered, only after the burial has been removed and thorough investigation of the area has been conducted and confirmation that no more human remains are found, mechanical excavation may proceed, slowly, with shallow passes of a flat blade 2-foot bucket. An Amah Mutsun Tribal Band Native American Monitor will be required to monitor this work. Given the context of the fact that our ancestral burial was recovered in a previously recorded mound site, and given the sensitive location of this site, I recommend that an Amah Mutsun Tribal Band Native American Monitor be required to monitor the rest of this project. Therefore, I recommend that all subsurface demolition, any and all excavations(i.e. for utilities, etc.), and tree/plant removal activities are monitored by an Amah Mutsun Tribal Band Native American Monitor. I am recommending that an Amah Mutsun Tribal Band Native American Monitor observe any and all subsurface excavation work, placing a Native American Monitor at each piece of any excavation equipment. I also recommend that the on-site Archaeologists plot the location and depth of each additional ancestral burial, grave/isolate locus, and/or other significant subsurface features by using GPS to pinpoint various aspects of the gravesite and other feature locations on the parcel and related maps. Given the possibility of discoveries of additional subsurface Archaeological Features at this site, if further excavations of features are investigated, I am requesting a weekly Status Report from the on site Archeological field personnel on any additional findings of our ancestral artifacts should a Amah Mutsun Tribal Band monitor not be present. Please be advised that Postings about these human remains through any and all forms of social media are unacceptable and therefore are prohibited. No photographs or video recording are allowed of our ancestral remains by the Construction Crew, anyone working at the site, or visiting the site, unless prior approval has been given by the MLD or Tribal Monitor. Lastly, I am requesting a response in writing on how work will proceed at the site, along with an updated treatment/mitigation plan. It is not our intention to hold up the progress of work at this site, we are available to begin burial recovery as soon as we are cleared to enter the site and with an approved budget.

Amah Mutsun Tribal Band of Mission San Juan Bautista

We are available to begin Monitoring work as soon as a schedule is made available to us. Should the Client or Archaeologists have any questions, please feel free to contact me.

Sincerely,

Irenne Zwielerlein

Tribal Chief of the Amah Mutsun Tribal Band of Mission San Juan Bautista

MLD

Tribal Chairwoman of the Amah Mutsun Tribal Band of Mission San Juan Bautista



3030 Soda Bay Road Lakeport, CA 95453
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Comment #39
PDF - City of Alameda



City of Alameda • California

Design Review Board
San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105

October 7, 2024

RE: Item 4, Bay Adapt Regional Shoreline Adaptation Plan; Second Review, October 7, 2024

Dear Design Review Board members,

The City of Alameda is pleased to submit comments on the Public Draft Regional Shoreline Adaptation Plan (RSAP) guidelines that will be used by local jurisdictions to develop subregional adaptation plans that meet the requirements of Senate Bill 272 (Laird 2023).

Since 2021, the City of Alameda has been leading the Oakland Alameda Adaptation Committee (OAAC) which is a coalition of shoreline communities and stakeholders working to accelerate sea level rise adaptation, protect and restore water quality, habitat and recreation and promote community resilience. OAAC has received funding from the National Fish and Wildlife Foundation and the San Francisco Estuary Institute to develop a long-term Subregional Adaptation Plan that details preliminary strategies and pathways for shoreline communities to take as the climate and shorelines change over time. We are developing this plan in parallel to the development of the RSAP guidelines and intend that the OAAC adaptation will meet the requirements of SB 272.

We have attached the detailed comments we provided in June 2024 on the Version 1 draft of the guidelines. We appreciate BCDC's responsiveness to many of the comments we submitted. Overall, we feel that good progress has been made with the Public Review draft version of the guidelines published in September 2024. However, we remain concerned that the following issues have not been addressed:

Simplify requirements. The proposed plan requires extensive detail and substantial resources for local jurisdictions to develop. The City requests BCDC simplify the requirements such that local jurisdictions have greater flexibility to align RSAP planning efforts within their existing planning and

community engagement processes and respond to local needs. For example, BCDC could provide greater flexibility and reduce the level of detail required:

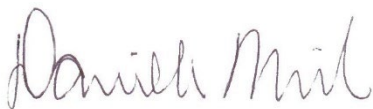
- Element B: Level of detail and specific datasets identified for existing conditions
- Element C: Level of detail, specific datasets, and approach to identifying priority action areas for exposure and vulnerability assessment
- Element D&E: Level of detail and degree of advance decision-making for adaptation action planning, and land use and policy changes
- Element F: Level of detail and advance decision-making regarding approach to implementation, especially with respect to costs, funding sources, and monitoring program
- Element G: Level of detail required for project list
- Specificity of requirements for community engagement and detail required for responses to the Equity Assessment

Streamlined planning process. Implementation of the RSAP should be streamlined to avoid unnecessary or duplicative requirements, for example with the Local Hazard Mitigation Plan. The City is concerned that this exhaustive new process with significant detailed planning requirements will take away resources and time for much needed implementation of adaptation measures which does not fully account for various planning work already undertaken at the local level. BCDC could make it clearer in the guidelines that cross-coordination with existing plans is encouraged.

Shoreline jurisdiction. The City is concerned that the draft RSAP guidelines hold cities and counties responsible for developing action plans for shoreline areas outside their jurisdiction and/or where the shoreline is managed by other agencies or private landowners.

We urge you to request that BCDC staff address these concerns in the final RSAP guidelines.

Sincerely,

A handwritten signature in blue ink that reads "Danielle Mieler". The signature is written in a cursive, flowing style.

Danielle Mieler, Sustainability and Resilience Manager
City of Alameda

Oakland Alameda Adaptation Committee RSAP Guidelines Version 1 Comments

June 4, 2024

General

Plan Elements						
<u>Element A:</u> Overview of Planning Process	<u>Element B:</u> Existing Conditions	<u>Element C:</u> Vulnerability Assessment	<u>Element D:</u> Adaptation Strategies and Pathways	<u>Element E:</u> Priority Project List	<u>Element F:</u> Land Use Plans and Policies	<u>Element G:</u> Implementation and Finance Plan

- Recommend allowing for (or encouraging) BCDC review and (conditional) approval of elements incrementally as they are completed. This would reduce the potential for rework if a local jurisdiction or lead agency heads down an incorrect path.
- If all elements are submitted at once, the resulting Plan document would include a substantial amount of content. Local jurisdictions or submitting entities may want to create a high-level overview of the Plan for community outreach purposes, and to brief decision makers and elected officials. Alternatively, the Plan could focus on the most important findings for each element, with each element serving as an appendix to the Plan.
- Elements F and G are very important to adaptation planning and should remain in this document. However, BCDC may wish to consider whether exceptions can be made in how detailed / how decisional this document is with respect to land use changes, implementation, and funding/financing.
- Editorial comment, but important to the document’s foundation: The plan is referred to as a “resiliency” plan and an “adaptation” plan. Recommend clarifying which this intends to be, as the terms are not synonymous though highly related and complementary. Presumably a resiliency plan would include elements beyond sea level rise adaptation.
- Overall, what is being called for is an extremely detailed plan that will require significant resources and cost with no funding source attached to it. Suggest simplifying requirements where possible, focusing on only the highest priority actions, reducing the number of required planning scenarios and greater alignment with existing plans. The plan should be high level and recognize that greater detailed plans will be provided as plans progress into projects. Jurisdictions need greater flexibility to plan in the way that works for them and aligns with their existing planning efforts.

Introduction and Purpose

- Please include references for “recent and ongoing studies and reports” that illustrate communities are not prepared for sea level rise.

Developing a Plan

Plan Requirements

- A local government within BCDCs jurisdiction may fall within a subregional shoreline resiliency plan as well as a county-level plan, and potentially also a local plan. This could create duplication of work, or repetitiveness in what is submitted to BCDC for review. Based on the BCDC Submission and Approval process, it appears that duplication of work across plans is preferred so that each Plan is complete (e.g., *“If county and local plans are submitted together, they will be reviewed together to ensure they are in alignment but also reviewed separately to ensure completeness of each plan.”*).
- Local governments required to create adaptation plans are also required to engage with other entities such as special districts who are not required to develop plans for lands that they own. It would be helpful for BCDC to provide guidance and support for local governments to engage with these entities, especially ones that may be involved in many planning process (i.e., Caltrans, EBRPD, etc.)
- Supporting lower capacity jurisdictions is not a good reason to set up a multi-jurisdictional plan. What does “lower capacity jurisdiction” mean? Why would they be left behind if creating a plan is required? All jurisdictions lack capacity and adequate funding, putting the burden on higher capacity jurisdictions does not seem fair. For the Oakland Alameda Adaptation Committee, the City of Alameda is leading despite being a smaller jurisdiction with less staff because we have the most to lose from sea level rise and we are stronger speaking with one voice with our larger, more well-resourced neighbors.

BCDC Submission and Review

- Data submittal: Depending on what is required, many jurisdictions have data layers that are sensitive in nature and cannot be shared. Or in other cases, data layers are constantly being refined and updated through other processes (e.g., stormwater systems), so submitting the data to BCDC could result in data confusion between this and other efforts.
- It sounds like no matter what, jurisdictions will be required to participate in a countywide planning process. Are counties prepared to take on this coordination role that goes beyond SB 272 requirements? If local or subregional plans are ahead in the planning process, will they be held back by the requirement to submit at the same time as the county plan?
- If plan coordination happens at the OLU scale, could that coordination take the place of county coordination as long as there is information sharing with the planning lead neighboring the OLU?

Plan Element Guidelines

Page 27 – Guidelines

- A1-a. This section requires OLU scale coordination whereas elsewhere county scale coordination is required. Suggest that a local jurisdiction could have the option to coordinate with either the county OR the OLU. In either case, some coordination or information sharing will need to happen with the planning entities that border the OLU or county plan.
- A2-a: Recommend using the SFEI Atlas OLU boundaries as the inland boundary. This considers coastal flooding, but a smoother project area boundary than using flood hazard layers directly. However, we do note that this boundary is static and does not consider future changes in the sea level rise science and other available data that are likely to occur before 2034. The SFEI Atlas could be updated to reflect these changes over time.

Page 29-31 – Element B Existing Conditions

- B1-g: This item may be challenging at the existing condition stage of the process. Barriers and conflicts often arise during the later elements in the workflow outlined by BCDC.
- B2 + B3: Some of this may be best suited for an online web map, map book, or appendix. Even though jurisdictions are encouraged to leverage prior work, this could result in a substantial number of maps and graphics.

Page 32-33 – Element C Vulnerability Assessment

- Recommend re-naming this element to “Exposure, Vulnerability, and Consequences Assessment”.
- C1-a: Jurisdictions will already be extremely challenged to plan out to 2100, let alone 2150 or the High emissions scenario because the scale of change required is so drastic and the uncertainties so large. Suggest requiring planning to 2050 INT and 2100 INT and INT-HIGH scenarios with 2150 and HIGH scenarios as optional.
- C2: Recommend allowing greater flexibility in how to assess vulnerability and how to reflect it in the documentation. It can be challenging and time consuming to get asset owners/operators to confirm/agree on the sensitivity, adaptive capacity, and consequences associated with each hazard, especially across multiple scenarios. Jurisdictions may spend a lot of time working with asset owners/managers and still end up with an “undetermined” or partial response. Some jurisdictions or asset owners may only be able to publicly share qualitative statements (e.g., may not be able to share sensitivity or adaptive capacity “ratings” for each asset).
- C2: Recommend reviewing the definition of “high priority assets and areas” – it is in part defined by the vulnerability and consequences of assets/areas, but the process suggests that the vulnerability and consequences haven’t been assessed until after the high priority assets and areas are determined. Suggest that assets could be taken from LHMP.
- C2-b/c: Recommend clarification between these two bullets (C2-b, C2-c): Is the distinction here the level of detail required in terms of vulnerability analysis for high priority assets and areas vs the whole shoreline/planning area?

- C1: Recommend reducing the prescriptive language and focusing the requirements on what is most important. Aiming to avoid duplicative maps and text (e.g., 17 categories x 4 time horizons x 3 hazards = over 204 maps and descriptions, many of which will be nearly identical).

Pages 34-37 – Element D Adaptation Strategies and Pathways

- Recommend avoiding the terms “structural” and “nonstructural” as a basis for defining the types of strategies, as those have [specific definitions](#) for US Army Corps of Engineers (USACE), and the terms are not always intuitive. The RSAP is not entirely consistent with USACE definitions (e.g., not *all* ecosystem restoration actions are “structural” actions). If the intent is to use structural and nonstructural, we recommend aligning with USACE definitions to avoid confusion.
- Recommend clarifying/revisiting the definition of adaptation pathways. The adaptation pathways approach is about enabling options for a future generation(s) to implement. Building in the ability to adapt a project to higher rates of sea level rise, if needed, and ideally not locking future generations into a single future pathway. The way it reads now, it sounds more like a series of predefined actions phased over time. An adaptation pathway approach should allow for more than one possible future.
- D4-b The number and specificity of adaptation strategies required is much too great to include in an overall plan and may not be feasible at this stage for 2100 and 2150 given the significant uncertainty and unknowns associated with planning that far out. At these time horizons, the plan should provide considerations for future planners and decision makers without being definitive and locking in decisions before we have all the information.
- D5 / D6: Recommend focusing evaluation and decision-making on short- and mid-term strategies, but not forcing a “decision” on a preferred adaptation pathway, as this decision will be made by future generations. It may be possible to glean from the evaluation process certain futures the team wishes to *avoid*, but I wouldn’t recommend requiring one preferred adaptation pathway for all reaches or for the whole planning area. The adaptation pathways approach is about maintaining/creating options for the future, not picking a future based on our inherently limited current knowledge.
- D6: Recommend incorporating more flexibility in this section (e.g., shift items from required to recommended, or convert items to be higher-level). It may be difficult to get consensus among stakeholders at this level of detail, and this will be a lot of content for stakeholders to keep track of.

Page 39 – Element F Land Use Plan and Policies

- F1-a: Description of land use and zoning changes should be kept general and high level and include options for consideration. We cannot commit to land use changes that have huge political and financial implications. This section should provide direction and considerations for future General Plan updates.

Minimum Standards and Recommendations

Page 42-44 – Minimum and Recommended Participants

- Recommend reflecting on the role of jurisdiction leadership (councils, boards of supervisors) in the process, encouraging jurisdictions to bring leadership along throughout the plan development as they must eventually pass a resolution to approve the Plan.
- Another consideration is the role of city/county attorneys. Recommend indicating this as a consideration, but perhaps leave it up to each jurisdiction to determine if/how/when to engage legal teams.
- Recommend providing greater flexibility for jurisdictions to decide which departments and agencies and stakeholders should be included in the project team. The list provides helpful suggestions but shouldn't be a required list.
- It should be recognized that food, stipends and childcare costs are not always allowed costs in grants and it is not always possible for jurisdictions to provide these benefits.

Page 49 – Coastal and Flood Hazard Standards

- Recommend making wave runup required. The Plan can rely on existing FEMA wave runup analysis or more detailed local-scale modeling to understand the existing wave climate and the potential for wave runup on existing structures. Shoreline adaptation strategies in areas with higher wave energy will require wave runup analysis to ensure they can mitigate future wave hazards.

Page 51-53 – Time Horizons and Hazard Scenario Standards

- The 2150 INT scenario is very similar to the 2100 HIGH scenario. Recommend requiring that jurisdictions consider this in their adaptation pathways. E.g., for a proposed pathway – does it do well under both INT and HIGH by 2100, if additional actions are taken? Or is the given pathway too hard to pivot to HIGH? Rather than *picking* a sea level rise scenario and building pathways *optimized* for that scenario, the goal is to use a range of future scenarios and take initial actions that will be successful under the broader range (or at least be cognizant of the implications when making the decision).
- Recommend putting more emphasis on the mid-term for this document and removing reference to a difference between “immediate term” and “short-term” and “near-term” strategies. Some smaller projects or urgent repairs may make sense to design for the short-term, but most reach- and subregional-scale strategies should be geared toward the mid-term. The design and implementation process can take many years, and the lifespan of the improvements could be 50 years or longer, which places most projects in the “mid-term” timeframe. Immediate or “short-term” projects can address existing risks while a larger-scale project is designed and permitted, and funding is lined up for implementation.
- Recommend a footnote clarifying that the 3.5' 100-year storm surge from AECOM 2016 is intended for high-level planning purposes and should not take the place of site-specific hydrodynamics modeling or engineering analyses. This note is included in AECOM 2016 but is often overlooked.

- Recommend changing this text: “We recommend use of one of two hydraulic models that exist regionally for the Bay; USGS’s Our Coast our Future or SFEI’s Shallow Groundwater Response to Sea Level Rise.” To this: “We recommend using of one of two datasets that exist regionally for the Bay; USGS’s Our Coast our Future or Pathways Climate Institute and SFEI’s Shallow Groundwater Response to Sea Level Rise.”

Pages 54-56 – Minimum Categories and Assets

- Some of the required datasets can be difficult to obtain (e.g., communications, electrical, water supply), whether due to sensitivity of the data, private ownership and proprietary concerns, or lack of organized records. Recommend considering a path forward for required assets for which data is not available for exposure / vulnerability analysis.
- This list includes data primarily providing the *location* of the assets, supporting the exposure analysis. However, additional asset-based characteristics are often required to inform the sensitivity and adaptive capacity of the assets(s), such as its age or condition. Consider providing additional resources regional resources to inform sensitivity and adaptive capacity of the required assets.

Pages 57-58 – Vulnerability Assessment Standards

- Recommend converting this to a recommendation / resource rather than making it part of a requirement. These questions can help a jurisdiction understand sensitivity, adaptive capacity, and consequences, but it is unclear exactly what is required – is the intent that the jurisdiction would provide definitive answers to each “criterion” (question) for each asset? Many of the questions are not applicable to all asset types.

Pages 59-60 – Adaptation Evaluation Criteria

- Recommend using this table and these questions to support strategy development and for reflecting how the preferred strategy will support the One Bay Vision, rather than using it for evaluating alternatives and comparing them to one another. Finding evaluation criteria that help differentiate between alternatives and support decision-making may be difficult to establish at the regional scale – each county/jurisdiction/group will need to go through the process of developing criteria that reflect the goals developed in Element D and iterate to see what the tradeoffs are for one strategy versus another.
- Recommend providing guidance for jurisdictions to focus evaluations primarily on the short- and mid-term strategies, and reflecting whether these strategies can be easily adapted to a range of mid- and long-term potential futures.

Pages 61-65 – Adaptation Strategy and Pathways Standards

- A1-A15: Recommend converting this to a series of *recommended* questions (not requirements) to ask of the project team during the strategy development process. These are great suggestions for how to approach the development of adaptation strategies and explore the range of options, but they don’t make sense as “requirements” (e.g., What exactly is required? Answering all the questions for each reach in the document? Creating 15 alternatives for each reach that maximize the objective of each question?).
- D: Suggest clarifying whether these are required or not (the intro statement says “must” but there are no red “R”s in this section).

- D-1: Suggest making this design standard flexible based on the functional lifespan / useful life of the project and the latest projections (e.g., 4' SLR with baseline 2000 above BFE may be appropriate for some projects, but this could change based on functional lifespan / useful life and updated projections closer to the implementation year).

Comment #40

From: Wils Cain (wils.cain@sierraclub.org) Sent You a Personal Message

<kwautomail@phone2action.com>

Sent: Monday, October 7, 2024 4:48 PM

To: BCDC PublicComment <publiccomment@bcdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed?The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement?To sustainably and cost-effectively protect the Bay Area, please consider the following:

1. Prioritize ecosystem health and NNBS at every step?NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems?essential to our communities, our economy, and global biodiversity?are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

* The RSAP should prioritize Baylands health by making NNBS and habitat ecosystems core considerations for every aspect of SLR plan development. As an example, mapping of opportunities for NNBS, including habitat migration, should be included in the checklists for each Strategic Regional Priority.

2. Clarify requirements and emphasize ecosystem health standards?Inconsistent reference to requirements between and among the Vision Statements, the ?required assets and actions? in Section 2, and the Standards in Section 3 may create confusion and hinder progress. Much like the equity assessment, Ecosystem health Standards should be explicitly required in each RSAP element and checklist, ensuring clarity, compliance, and successful implementation.

3. Strengthen Groundwater and Contamination Standards?SLR poses significant contamination risks from toxic sites and landfills along the shoreline. While the RSAP includes a narrow standard for reducing contamination risks due to flooding in socially vulnerable, environmental justice (EJ) communities, it fails

to address non-emergent groundwater rise and soil disruption related to adaptation projects themselves. The RSAP currently also lacks any contamination Standard for non-EJ communities.??

* Expand Contamination Standards?Broaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

4. Define Metrics for Habitat Goals

The RSAP includes a Standard that requires protection, restoration, and/or enhancement of Baylands habitats to ?meet habitat goals,? but these goals are neither defined or quantified.?

* The RSAP should establish clear, measurable habitat goals and require each local plan to specify how it will contribute to them, and BCDC should monitor and report on progress toward these targets to ensure accountability and success.

This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

Wils Cain

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Comment #41

From: June Cancell (june.c@sbcglobal.net) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Monday, October 7, 2024 7:14 PM

To: BCDC PublicComment <publiccomment@bcdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
To sustainably and cost-effectively protect the Bay Area, please consider the following:

1. Prioritize ecosystem health and NNBS at every step
NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems—essential to our communities, our economy, and global biodiversity—are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

* The RSAP should prioritize Baylands health by making NNBS and habitat ecosystems core considerations for every aspect of SLR plan development. As an example, mapping of opportunities for NNBS, including habitat migration, should be included in the checklists for each Strategic Regional Priority.

2. Clarify requirements and emphasize ecosystem health standards
Inconsistent reference to requirements between and among the Vision Statements, the "required assets and actions" in Section 2, and the Standards in Section 3 may create confusion and hinder progress. Much like the equity assessment, Ecosystem health Standards should be explicitly required in each RSAP element and checklist, ensuring clarity, compliance, and successful implementation.

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SLR poses significant contamination risks from toxic sites and landfills along the shoreline. While the RSAP includes a narrow standard for reducing contamination risks due to flooding in socially vulnerable, environmental justice (EJ) communities, it fails

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* Expand Contamination Standards\nBroaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

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This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

June Cancell

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Comment #42

From: Kermit Cuff (tierno23@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Monday, October 7, 2024 7:15 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

I'm a runner who frequents to shoreline trails around the bay.

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

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Sincerely,

Kermit Cuff

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Comment #43

From: Nona Weiner (nonaweiner@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Monday, October 7, 2024 7:29 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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* The RSAP should establish clear, measurable habitat goals and require each local plan to specify how it will contribute to them, and BCDC should monitor and report on progress toward these targets to ensure accountability and success.

This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

Nona Weiner

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Comment #44

From: Freda Hofland (towildwood@aol.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Monday, October 7, 2024 7:32 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
To sustainably and cost-effectively protect the Bay Area, please consider the following:

1. Prioritize ecosystem health and NNBS at every step
NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems—essential to our communities, our economy, and global biodiversity—are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

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3. Strengthen Groundwater and Contamination Standards
SLR poses significant contamination risks from toxic sites and landfills along the shoreline. While the RSAP includes a narrow standard for reducing contamination risks due to flooding in socially vulnerable, environmental justice (EJ) communities, it fails

to address non-emergent groundwater rise and soil disruption related to adaptation projects themselves. The RSAP currently also lacks any contamination Standard for non-EJ communities.??

* Expand Contamination Standards\nBroaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

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Thank you for your consideration.

Sincerely,

Freda Hofland

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Comment #45

From: Lorna Groundwater (lornagwater@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Monday, October 7, 2024 8:18 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Lorna Groundwater

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Comment #46

From: linda rudin (leewaysf@pacbell.net) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Monday, October 7, 2024 8:31 PM

To: BCDC PublicComment <publiccomment@bcdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

linda rudin

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Comment #47

From: Ruby Mitchell (rubyrubydesign@icloud.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Monday, October 7, 2024 9:02 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Ruby Mitchell

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Comment #48

From: Joyce Summers (jarsummers@sbcglobal.net) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Monday, October 7, 2024 9:19 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Protect our water and natural environment for us and the future!

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Joyce Summers

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Comment #49

From: Katja Irvin (katja.irvin@sbcglobal.net) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Monday, October 7, 2024 9:19 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Katja Irvin

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Comment #50

From: Jeffrey Barile (jbarile@hotmail.com) Sent You a Personal Message

<kwautomail@phone2action.com>

Sent: Monday, October 7, 2024 9:51 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Jeffrey Barile

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Comment #51

From: Ted Fishman (ted10000@hotmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Monday, October 7, 2024 9:57 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Thank you for your consideration.

Sincerely,

Ted Fishman

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Comment #52

From: Karen Zamel (karenzamel@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Monday, October 7, 2024 10:11 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

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This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

Karen Zamel

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Comment #53

From: Serena Myjer (serenamyjer@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Monday, October 7, 2024 10:39 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

I want to see healthy habits and communities in the future!

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

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Thank you for your consideration.

Sincerely,

Serena Myjer

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Comment #54

From: James Stamos (jstamos@alum.mit.edu) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Tuesday, October 8, 2024 2:05 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

James Stamos

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Comment #55

From: Michael Colgan (mjcolgan@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 8, 2024 6:18 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Michael Colgan

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Comment #56

From: Davena Gentry (davena@sereno.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 8, 2024 7:18 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Living less than a mile from the Bay this matters!

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
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Thank you for your consideration.

Sincerely,

Davena Gentry

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Comment #57

From: Carol Steinfeld (flowscapes@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 8, 2024 7:44 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Carol Steinfeld

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Comment #58

From: Sam Butler (samjbutler@sbcglobal.net) Sent You a Personal Message

<kwautomail@phone2action.com>

Sent: Tuesday, October 8, 2024 9:05 AM

To: BCDC PublicComment <publiccomment@bcdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Sam Butler

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Comment #59

From: Darrell Neft (dsneft@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 8, 2024 9:09 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Thank you for your consideration.

Sincerely,

Darrell Neft

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Comment #60

From: Leonie Terfort (Lterfort@icloud.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Tuesday, October 8, 2024 9:53 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Thank you for your consideration.

Sincerely,

Leonie Terfort

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Comment #61

From: Dawna Knapp (dawna.knapp@sierraclub.org) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 8, 2024 10:40 AM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
To sustainably and cost-effectively protect the Bay Area, please consider the following:

1. Prioritize ecosystem health and NNBS at every step
NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems—essential to our communities, our economy, and global biodiversity—are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

* The RSAP should prioritize Baylands health by making NNBS and habitat ecosystems core considerations for every aspect of SLR plan development. As an example, mapping of opportunities for NNBS, including habitat migration, should be included in the checklists for each Strategic Regional Priority.

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to address non-emergent groundwater rise and soil disruption related to adaptation projects themselves. The RSAP currently also lacks any contamination Standard for non-EJ communities.??

* Expand Contamination Standards\nBroaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

4. Define Metrics for Habitat Goals

The RSAP includes a Standard that requires protection, restoration, and/or enhancement of Baylands habitats to ?meet habitat goals,? but these goals are neither defined or quantified.?

* The RSAP should establish clear, measurable habitat goals and require each local plan to specify how it will contribute to them, and BCDC should monitor and report on progress toward these targets to ensure accountability and success.

This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

Dawna Knapp

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Comment #62

From: Cindy Abbott (cala3319@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Tuesday, October 8, 2024 10:47 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Now is the time to develop a robust and encompassing plan. The future of the bay and surrounding areas requires strong habitat protections that have measurable outcomes, triggers and milestones. Overall ecosystem health that is enhanced through nature based solutions are how to do this. Please ADD and PRIORITIZE these goals.

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
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However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

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Thank you for your consideration.

Sincerely,

Cindy Abbott

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Comment #63

From: Margaret Phelps (margaretphelps@msn.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 8, 2024 11:10 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Margaret Phelps

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Comment #64

From: Kathy Battat (kbattat@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Tuesday, October 8, 2024 11:28 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

We should set higher standards for groundwater rise and contamination and measurable habitat and ecosystem goals.

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Kathy Battat

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Comment #65

From: Benjamin Etgen (betgen@calweb.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 8, 2024 11:38 AM

To: BCDC PublicComment <publiccomment@bcdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Benjamin Etgen

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Comment #66

From: JL Angell (jangell@earthlink.net) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 8, 2024 11:38 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Sincerely,

JL Angell

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Comment #67

From: Laura Sternberg (laura.sternberg@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 8, 2024 11:39 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Laura Sternberg

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Comment #68

From: Brenda Hattisburg (brendahattisburg@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 8, 2024 11:51 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

This issue matters to myself and to many others because climate change has begun to effect many elements of the life we once took for granted. The air that we breathe, the water that we drink and bathe in, the food that is grown which we eat.

It is time to begin to build safeguards to ensure that all people living in areas near the coast where sea levels are rising will be safe.

- 1) New housing should be built further inland.
- 2) A barrier should constructed perhaps made of stone or other natural materials to keep rising sea waters from reaching dry land.
- 3) Homes, schools and buildings should be inspected for foundations to ensure that these structures will not crumble should or when another earthquake hits. Stronger building codes should be created and established for safety for everyone.
- 4) More trees and foliage should be planted along the coastline to help absorb any water that may damage existing buildings or homes; schools or playgrounds.

Thank you.

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Sincerely,

Brenda Hattisburg

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Comment #69

From: Alan Wortman (alan.wortman@outlook.com) Sent You a Personal Message

<kwautomail@phone2action.com>

Sent: Tuesday, October 8, 2024 12:06 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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* Expand Contamination Standards\nBroaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

4. Define Metrics for Habitat Goals

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This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

Alan Wortman

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Comment #70

From: Charlene Kerchevall (ramblin@cox.net) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 8, 2024 12:35 PM

To: BCDC PublicComment <publiccomment@bcdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
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Thank you for your consideration.

Sincerely,

Charlene Kerchevall

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Comment #71

From: Bruce England (bkengland@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Tuesday, October 8, 2024 12:46 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Bruce England

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Comment #72

From: Christopher Ware (cmdubb@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Tuesday, October 8, 2024 12:52 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Christopher Ware

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Comment #73

From: Joslyn Baxter (joslyn.baxter@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 8, 2024 1:07 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Thank you for your consideration.

Sincerely,

Joslyn Baxter

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Comment #74

From: Saran K/ (sarank@mac.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 8, 2024 1:37 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

We need all these working when climate change hits us.

Dear BCDC Commission,

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Commendable Progress, But More Is Needed
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Thank you for your consideration.

Sincerely,

Saran K/

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Comment #75

From: Mary Stanistreet (mkstanistreet@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 8, 2024 2:08 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Thank you for your consideration.

Sincerely,

Mary Stanistreet

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Comment #76

From: Monica Donovan (monica.donovan@comcast.net) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 8, 2024 2:55 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

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Thank you for your consideration.

Sincerely,

Monica Donovan

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Comment #77

From: Kevin Goodwin (kmgoodwin365@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 8, 2024 3:46 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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Thank you for your consideration.

Sincerely,

Kevin Goodwin

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Comment #78

From: Twyla Malchow-Hay (twylakaylee@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 8, 2024 4:02 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
To sustainably and cost-effectively protect the Bay Area, please consider the following:

1. Prioritize ecosystem health and NNBS at every step
NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems—essential to our communities, our economy, and global biodiversity—are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

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3. Strengthen Groundwater and Contamination Standards
SLR poses significant contamination risks from toxic sites and landfills along the shoreline. While the RSAP includes a narrow standard for reducing contamination risks due to flooding in socially vulnerable, environmental justice (EJ) communities, it fails

to address non-emergent groundwater rise and soil disruption related to adaptation projects themselves. The RSAP currently also lacks any contamination Standard for non-EJ communities.??

* Expand Contamination Standards\nBroaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

4. Define Metrics for Habitat Goals

The RSAP includes a Standard that requires protection, restoration, and/or enhancement of Baylands habitats to ?meet habitat goals,? but these goals are neither defined or quantified.?

* The RSAP should establish clear, measurable habitat goals and require each local plan to specify how it will contribute to them, and BCDC should monitor and report on progress toward these targets to ensure accountability and success.

This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

Twyla Malchow-Hay

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Comment #79

From: Sheila Tarbet (starbet99@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 8, 2024 5:01 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Sheila Tarbet

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Comment #80

From: Ann Dorsey (aedorsey@hotmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 8, 2024 9:00 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Our coasts are key to our survival and must be protected.

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
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Thank you for your consideration.

Sincerely,

Ann Dorsey

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Comment #81

From: Dennis Allen (dallen4191@aol.com) Sent You a Personal Message

<kwautomail@phone2action.com>

Sent: Tuesday, October 8, 2024 9:13 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Nature based solutions are key to addressing climate change and insuring a healthy planet.

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
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Thank you for your consideration.

Sincerely,

Dennis Allen

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Comment #82

From: AJ Cho (amenoartemis@gmail.com) Sent You a Personal Message

<kwautomail@phone2action.com>

Sent: Tuesday, October 8, 2024 10:50 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

AJ Cho

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Comment #83

From: Marilyn Price (mprice@the-acorn.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 8, 2024 11:43 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Marilyn Price

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Comment #84

From: Jimmie Lunsford (jimmieleelunsford@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Wednesday, October 9, 2024 3:31 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Jimmie Lunsford

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Comment #85

From: Deb Runyan (deb.runyan408@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Wednesday, October 9, 2024 1:00 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Please emphasize nature-based solutions.

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Deb Runyan

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Comment #86

From: Carla Holmes (peteandcarla@sbcglobal.net) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Wednesday, October 9, 2024 3:26 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

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The RSAP includes a Standard that requires protection, restoration, and/or enhancement of Baylands habitats to ?meet habitat goals,? but these goals are neither defined or quantified.?

* The RSAP should establish clear, measurable habitat goals and require each local plan to specify how it will contribute to them, and BCDC should monitor and report on progress toward these targets to ensure accountability and success.

This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

Carla Holmes

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Comment #87

From: Glenn Fisher (fisher.glenna@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Wednesday, October 9, 2024 4:14 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

As a homeowner living less than a mile from the Bay, with a floor level that is at mean high tide, if the current levees fail, my house is awash, so I'm very concerned about how Bay communities address climate change and sea level rise.

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
To sustainably and cost-effectively protect the Bay Area, please consider the following:

1. Prioritize ecosystem health and NNBS at every step
NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems?essential to our communities, our economy, and global biodiversity?are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

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3. Strengthen Groundwater and Contamination Standards
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* Expand Contamination Standards
Broaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

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Thank you for your consideration.

Sincerely,

Glenn Fisher

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Comment #88

From: Elaine Katzenberger (elaine@citylights.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Wednesday, October 9, 2024 4:18 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Elaine Katzenberger

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Comment #89

From: Helen Hays (hlhays75@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Wednesday, October 9, 2024 5:01 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Helen Hays

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Comment #90

From: Ernie Walters (ernwalt@comcast.net) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Wednesday, October 9, 2024 5:14 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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Thank you for your consideration.

Sincerely,

Ernie Walters

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Comment #91

From: Martin Horwitz (martin7ahorwitz@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Wednesday, October 9, 2024 5:20 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Thank you for your consideration.

Sincerely,

Martin Horwitz

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Comment #92

From: Ernie Walters (ernwalt@aol.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Wednesday, October 9, 2024 5:46 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Sincerely,

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Comment #93

From: Carol Schaffer (cschaff@aol.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Wednesday, October 9, 2024 5:48 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Carol Schaffer

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Comment #94

From: James R (Randy) Monroe (randy@monroescienceed.com) Sent You a Personal Message <kwautomail@phone2action.com>

Sent: Wednesday, October 9, 2024 6:08 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Sincerely,

James R (Randy) Monroe

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Comment #95

From: B Sandow (bysandow@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Wednesday, October 9, 2024 7:08 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems—essential to our communities, our economy, and global biodiversity—are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

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2. Clarify requirements and emphasize ecosystem health standards
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3. Strengthen Groundwater and Contamination Standards
SLR poses significant contamination risks from toxic sites and landfills along the shoreline. While the RSAP includes a narrow standard for reducing contamination risks due to flooding in socially vulnerable, environmental justice (EJ) communities, it fails

to address non-emergent groundwater rise and soil disruption related to adaptation projects themselves. The RSAP currently also lacks any contamination Standard for non-EJ communities.??

* Expand Contamination Standards\nBroaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

4. Define Metrics for Habitat Goals

The RSAP includes a Standard that requires protection, restoration, and/or enhancement of Baylands habitats to ?meet habitat goals,? but these goals are neither defined or quantified.?

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This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

B Sandow

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Comment #96

From: Wanda Nichols (wm5cents@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Wednesday, October 9, 2024 7:21 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
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Thank you for your consideration.

Sincerely,

Wanda Nichols

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Comment #97

From: Jan Warren (jxwarren1947@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Wednesday, October 9, 2024 7:49 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

more natural wetlands that protect the shore and the air

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Jan Warren

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Comment #98

From: Andrea Anderson (andrea.anderson@sbcglobal.net) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Wednesday, October 9, 2024 8:25 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Let make nature back into nature. More concrete is NOT a solution.

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
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Thank you for your consideration.

Sincerely,

Andrea Anderson

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Comment #99

From: Carolyn Cheng (carolyn.cheng@sierraclub.org) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Wednesday, October 9, 2024 8:30 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Thank you for your consideration.

Sincerely,

Carolyn Cheng

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Comment #100

From: Timonessa Santarsiero (lighthaus@earthlink.net) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Wednesday, October 9, 2024 8:34 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

The respect and love for our San Francisco Bay Area is enshrined in its name. Please do whatever you can to sustain this national treasure, valued and held dear by locals and international citizens alike!

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

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Thank you for your consideration.

Sincerely,

Timonessa Santarsiero

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Comment #101

From: Ginny Madsen <madsenginny3@gmail.com>

Sent: Wednesday, October 9, 2024 8:34 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Initial response to the RSAP - comments for BCDC

My name is Ginny Madsen and I am commenting on the Regional Shoreline Adaptation Plan because I believe that observations I have made as an educated resident should be considered by the BCDC. In reading the draft RSAP, I immediately noticed – in ALL of the wonderful aerial photos and maps - the paucity of information / annotation on the Bay shoreline between San Leandro and Hayward. I worry that this is because this area is considered un-remarkable, not at risk or not pertinent to BCDC's mandate of protecting the San Francisco Bay shoreline as the climate changes. I do know that what happens anywhere on the Bay shoreline impacts the Bay and nearby areas. I am grateful to see a representative from the San Leandro City Council, Bryan Azevedo in the Local Elected Regional Task Force but I know Bryan does not have my perspective so feel I must make a comment. Because I do not have a group affiliation or title I will describe my context and background a bit first so you know where I am coming from and why I think I have a right to comment to your group.

I am an elderly woman, whose family has been in the East Bay since the 1880's. I graduated from San Jose State with a BS in Geology and Chemistry in 1983. I have lived and worked, or had friends and family, in almost every part of the Bay and have known many parts of the shoreline intimately in various times in my life. Particular images which come to mind are:

1) I worked a job in Alviso in the mid 1980's in a 2 story building that two years before had had Bay water coming up to the 2nd floor windows. There was a picture on the wall of the company principals loading papers and computer equipment into a dinghy bobbing at the window.

2) In the mid 1990's I worked at a bio-tech company in Foster City that was right next to the levee at the edge of the Bay. During high tides, the plumbing in that building would back up and the stench of sewer gas was overwhelming. The lawyers and upper level management were all up on the 4th floor of this large building and they would call in sick when high tide was in. I was on the first floor and that situation still resonates with me today.

3) For the past 19 years I have lived in San Leandro within a quarter mile of the shoreline. When I first moved here I would walk everywhere there sometimes two or three or four times a day. Now I can't, but my back yard still abuts the 'little' golf course that is across the Monarch Bay Drive from the Bay. In the past 10 years I have watched king tides bubble up through storm drains near my house and flood Marina Blvd., and I have experienced weird plumbing issues from the slab in my little rented duplex during high water events.

I am sharing the observations below because I think that BCDC will not hear this perspective from anyone else.

Shortly after I first moved to San Leandro, in about 2007 a man who was running for mayor knocked on my door and told me all about the big Shoreline development plans that the City had. I was stunned that they were going to put large 5 story buildings (hotel and/or conference center on what I already clearly knew was unstable fill in a region highly susceptible to liquefaction... and I told him so. He, of course, tried to tell me that I didn't know what I was talking about. I had only an SJSU geology student's general knowledge of the Bay but I knew I wasn't wrong. That started me looking at USGS papers online in my spare time ... and trying to tell the City Council what I was finding. I was amazed to learn that the geology of the San Leandro shoreline area was very different even from adjacent areas north and south of it because of the 'pull-apart basin' that dissected the Franciscan basement rock (see Figure 16, page 22 of https://www.researchgate.net/publication/278679276_Engineering_Geologic_Site_Characterization_of_the_Greater_Oakland_Alameda_Area_Alameda_and_San_Francisco_Counties_California).

Because this basin was filled with sediments shed off the rising Hayward fault escarpment, bay sediments are far deeper there than just a few miles away. In the area of the San Leandro Shoreline Development project it is 1000 feet down to Franciscan bedrock with the overlying Bay Mud sediments and fill being unconsolidated and requiring special mitigations for large buildings. I believe that these mitigations make this area of the shoreline worthy of some attention from the BCDC.

While I cannot find the email I wrote to BCDC around 2015, I know the following comment sent to the NEPA docket in 2020 is very similar:

“I live in an old neighborhood on the edge of San Francisco Bay just south of Oakland Airport. This used to be a farming community before it was annexed to the City of San Leandro. In the 1950's the City was given 10 miles of bay shoreline wetlands and turned it into a park, a golf course and a boat marina. But the City could not afford the dredging that was required to keep the marina from silting up or maintenance of the hardscape that was put in. When around 2000 one of the restaurants by the marina burned down the City started to look for funding to rebuild it. There is still a small hotel and a couple of restaurants that have been in operation since the 1970's but for the past 20 years the City has been trying to get a developer to turn this area into a money maker for the City.

Now, despite community and Bay Conservation Development Commission opposition, they are going ahead with plans to build a large 220 room Hyatt, 5 story apartment building and a wall of high density single family homes along the bayshore on seismically vulnerable bay fill. Bay waters are already encroaching and this area is now considered by FEMA to be a flood hazard zone. The planned structures will destroy long time monarch butterfly habitat and what remains of the shoreline, as well as the neighborhoods behind it.

At a time when cities along the Bay are spending to return shoreline to open wetlands to protect more inland areas from sea level rise, San Leandro is doing the opposite on the developer's promise of financial windfall. Fixing this will cost more than will ever be gained by doing it, will affect other areas of the Bay, and make this area much more vulnerable. I, and so many of my neighbors feel our concerns are being ignored. “

It was most gratifying when I heard from the City in 2017 that BCDC had issued a rule about a 100 foot setback. I have had email accounts and two computers go belly up on me in the last 15 years and lost my copies of many of the references and cross sections I managed to find in different USGS papers, but still have some of what I wrote on this subject. I wrote a lengthy comment to the Draft Environmental Impact Report for the Shoreline project and was stunned to get a three page response from the City Manager at the time, but have been unable to find it again. It really didn't respond to my geologic or environmental points because the City's primary concern was not for the health of the Bay (or the safety of the project) but was focused on costs and revenue projections.

Because my Councilmember told me he didn't believe me that the San Leandro marina area was any different than the Brooklyn Basin in Oakland which was at that time under high rise development, I spent hours going through isopach maps in different sources to compare the two areas. Here is the text of the email I wrote him on July 19 2019 – which went unanswered:

“ And because you asked, I did some looking at papers I have collected to find out how the SL Marina area compares to Brooklyn Basin. Took me an afternoon of looking at isopach maps in ENGINEERING GEOLOGIC SITE CHARACTERIZATION OF THE GREATER OAKLAND-ALAMEDA AREA ALAMEDA AND SAN FRANCISCO COUNTIES, CALIFORNIA by J. David Rogers, Ph.D. and Sands H. Figuers, Ph.D 30 December 1991 but this is what I deduced.

Major differences are related to:

1. A deep basin formed in the San Leandro area between 1,000,000 and 500,000 years before present. This has been filled by creek and bay sediments continuously until recent times when man-made fill was used to reach the current level.
2. The area around Brooklyn Basin was close to or actually Bay shoreline since 100,000 ybp and the channel in front of it was actually dug deeper in the late 1800s. ["At about this same time (1879-1893) a local group of merchants sponsored the creation of a continuous channel between Fruitvale (then known as "The Annex") and Alameda, thereby making Alameda an island. The idea behind such a longlived project was to create a continuous channel which would hopefully utilize the natural tidal draw to pull natural silt out of San Antonio slough..."]

I think the following comparison I put together kind of makes it clear that the Marina and Brooklyn Basin are different. Sediments are so much deeper at the Marina - you have to go

through 1000 feet of unconsolidated sediment to get to bedrock at the Marina. The 'chocolate pudding' is thick here.

Depth at	SL Marina	Brooklyn Basin
Bay Fill	0 feet	
Young Bay Mud	25 - 50 feet	0 feet
San Antonio Formation	100 feet	25 feet
Yerba Buena Formation	120 feet	30 feet
Alameda Formation marine	150+ feet	50 feet
Alameda Formation non-marine	900 feet	600 feet
Franciscan Formation bedrock	1000+ feet	700 feet

A little background...

Bay Fill [less than 100 years before present]

Young Bay Mud [About 10,000 ybp]

San Antonio Formation [About 75,000 ybp]

Yerba Buena Formation (aka Old Bay Mud) [about 100,000ybp]

Alameda Formation [200K to 700K ybp] there was a sea level rise here so Alameda Formation marine sediments overlie Alameda Formation land based deposits.

I can only hope I have made this clear for you. If not, tell me. The paper is actually much more readable than the other one that you looked at but not available online. Let me know if you want me to try and get a copy to you. “

As the plans of the San Leandro Shoreline development evolved over the next several years, I continued to pay attention and comment on my concerns to the Council. The reward for this came in the form of the statements in a geotechnical report by the consulting firm hired by the developer. This was buried in attachments to the June 21 2022 Council meeting on page 7 of Attachment J “Shoreline Environmental Review Summary . <https://sanleandro.legistar.com/View.ashx?M=F&ID=10989639&GUID=6CADAD18-120E-40B1-8754-6226CA7C97E5>. BCDC needs to at least be aware that it states that prior to building fluids must be pressed out of the deep unconsolidated Bay Muds that underlie the site by surcharging with a 15 foot high (on top of the required 6 foot high raised grade of the building) 'mountain' of 'fill' to stay in place until fluids in the underlying Bay May have been drained which could take a year or more.

To make it easier for you to read, here is an excerpt from the final paragraphs: “For preliminary purposes and based on our understanding of the project development, we estimate **surcharge fill heights of up to 15 feet** may be required to mitigate consolidation settlement resulting from raised site grades and proposed buildings.

The time necessary for a successful surcharge program is a function of the drainage path, which is related to the thickness of the Young Bay Mud. To achieve the level of consolidation required within a reasonable time range, the use of closely spaced, vertical

wick drains is often required to help accelerate the surcharge rates. These allow excess pore pressure to drain laterally, shortening the drainage path, and taking advantage of the fact that the horizontal permeability of Young Bay Mud is normally much greater than the vertical permeability. For preliminary purposes and as part of a surcharge fill placement program, we estimate the use of wick drains at a 5- to 7-foot spacing in a triangular grid pattern and extending a minimum of 5 feet below the bottom of the Young Bay Mud layer (estimated depth of 30 feet) would **achieve consolidation settlement mitigation in 6 to 12 months. The duration begins once the design surcharge height is reached.**”

Here is a link to the last presentation about the plans for the Monarch Bay Shoreline development Dec 19 2022 which still show hardscape within 100 feet of the shoreline. <https://sanleandro.legistar.com/View.ashx?M=F&ID=11524755&GUID=5C651C1E-8C76-4DDB-B792-6350A7FEBF34> And in December of 2023 the developer defaulted on their loan to the City for this project.

I have always believed that the Bay shoreline in San Leandro needs to remain a park and open-space. It is an area that is well used and visited by many people from surrounding communities. The City of San Leandro really doesn't dispute this, but continues to want to capitalize and derive revenue from the area by building commercial infrastructure. They just can't seem to see the area without a large, revenue-producing hardscape, the mitigations for which will ravage the natural shoreline for years and likely will end up destroying it.

This is what has kept me commenting for 15 years, and what I am hoping BCDC can help make clear by REQUIRING that jurisdictions really consider the health of the Bay and PROVE that they are considering it in their planning. The BCDC really needs to be STRIDENT in explicating that our natural shorelines are what make us more resilient.

Thank you for reading what turned out to be a length email. I am going to forward more comments about another City of San Leandro project in an area just south of the Shoreline Development area known as “Long Beach” in a separate email.

Sincerely,

Ginny Madsen

Comment #102

From: Parvati Dutta (parvati@parvatidev.org) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Wednesday, October 9, 2024 9:20 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

My 4-year old grandson loves visiting the shore at the Baylands. he pokes around for clamshells in the mud, and shows me the nests the birds make. Concrete walls will make all these inaccessible. The wonder of nature makes for healthy mental growth in kids. The Baylands is a practical plan for climate resilience, and it keeps our Baylands available for all our kids now and in the long future.

Thank you.

Parvati

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
To sustainably and cost-effectively protect the Bay Area, please consider the following:

1. Prioritize ecosystem health and NNBS at every step
NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems?essential to our communities, our economy, and global biodiversity?are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

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2. Clarify requirements and emphasize ecosystem health standards
Inconsistent reference to requirements between and among the Vision Statements, the ?required assets and actions? in Section 2, and the Standards in Section 3 may create confusion and hinder progress. Much like the equity

assessment, Ecosystem health Standards should be explicitly required in each RSAP element and checklist, ensuring clarity, compliance, and successful implementation.

3. Strengthen Groundwater and Contamination Standards
SLR poses significant contamination risks from toxic sites and landfills along the shoreline. While the RSAP includes a narrow standard for reducing contamination risks due to flooding in socially vulnerable, environmental justice (EJ) communities, it fails to address non-emergent groundwater rise and soil disruption related to adaptation projects themselves. The RSAP currently also lacks any contamination Standard for non-EJ communities.??

* Expand Contamination Standards
Broaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

4. Define Metrics for Habitat Goals

The RSAP includes a Standard that requires protection, restoration, and/or enhancement of Baylands habitats to "meet habitat goals," but these goals are neither defined or quantified.?

* The RSAP should establish clear, measurable habitat goals and require each local plan to specify how it will contribute to them, and BCDC should monitor and report on progress toward these targets to ensure accountability and success.

This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

Parvati Dutta

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

Comment #103

From: J. Barry Gurdin (gurdin@hotmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Wednesday, October 9, 2024 9:49 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

J. Barry Gurdin

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Comment #104

From: Margie Halladin (margiehalladin@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Wednesday, October 9, 2024 10:01 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Margie Halladin

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Comment #105

From: Elizabeth Estes (kitties2@charter.net) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Wednesday, October 9, 2024 10:23 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Elizabeth Estes

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Comment #106

From: Carol Bostick (lunagata8@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Thursday, October 10, 2024 12:11 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Thank you for your consideration.

Sincerely,

Carol Bostick

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Comment #107

From: Michael Price (mp969@comcast.net) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Thursday, October 10, 2024 1:22 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Michael Price

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Comment #108

From: Elizabeth Brooking (brooking.liz@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Thursday, October 10, 2024 12:57 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

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COMMENT #109

From: L Hourley (lagphdpaq@gmail.com) Sent You a Personal Message

<kwautomail@phone2action.com>

Sent: Thursday, October 10, 2024 5:30 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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Sincerely,

L Hourley

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #110

From: Joslyn Baxter (joslyn.baxter@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Thursday, October 10, 2024 7:57 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
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to address non-emergent groundwater rise and soil disruption related to adaptation projects themselves. The RSAP currently also lacks any contamination Standard for non-EJ communities.??

* Expand Contamination Standards\nBroaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

4. Define Metrics for Habitat Goals

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Thank you for your consideration.

Sincerely,

Joslyn Baxter

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COMMENT #111

From: Robert Sicotte (rob.sicotte@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Friday, October 11, 2024 7:17 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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Robert Sicotte

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COMMENT #112

From: Greg Chiampou <gchiampou@gmail.com>
Sent: Friday, October 11, 2024 8:46 AM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: BCDC Regional Bay Adaptation Plans - Comment

I have not yet finished reading the entire draft plan, but had a question: Does the plan encourage, support or leverage in any way the existing Native American tribal initiatives for ecological restoration activities? See website link below for a description of a local native tribal organization dedicated to ecological restoration (Ramaytush.org.)

I think supporting ecological efforts today (which is what the BCDC SLR draft plan is all about) and incorporating Native American's contributions can mean more than simply acknowledging the original tribal ownership of the Bay Area land and the local Native American history. It would be mutually beneficial to incorporate today's tribal ancestors for both insights and action under the BCDC plan.

Thank you.

Greg Chiampou
San Francisco, CA



Ecological Restoration
ramaytush.org

COMMENT #113

From: Scott Turner (bgiscott@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Friday, October 11, 2024 11:34 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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Thank you for your consideration.

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Scott Turner

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COMMENT #114

From: June Cancell (june.c@sbcglobal.net) Sent You a Personal Message

<kwautomail@phone2action.com>

Sent: Saturday, October 12, 2024 7:20 PM

To: BCDC PublicComment <publiccomment@bcdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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COMMENT #115

From: Rush Rehm (mrehm@stanford.edu) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Saturday, October 12, 2024 9:18 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

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Thank you for your consideration.

Sincerely,

Rush Rehm

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COMMENT #116

From: Laura Overmann (overmann@earthlink.net) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Sunday, October 13, 2024 7:33 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

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COMMENT #117

From: Brian Forney (brian.forney@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Sunday, October 13, 2024 8:04 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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COMMENT #118

From: Judith Butts (judith.butts@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Sunday, October 13, 2024 11:14 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

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COMMENT #119

From: Laura Sternberg (laura.sternberg@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Sunday, October 13, 2024 11:42 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

Laura Sternberg

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #120

From: Dawn Manley (dawnmanley5508@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Sunday, October 13, 2024 7:52 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

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Thank you for your consideration.

Sincerely,

Dawn Manley

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COMMENT #121

From: Diane McCoy (dianemccoy10@comcast.net) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Monday, October 14, 2024 8:23 AM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commissioners.

Now more than ever it is time to reverse our thinking, planning and actions.

Protecting and preserving the bay and wetlands will insure the best natural protection against sea level rise and other potential climate change consequences including flooding and great loss of carbon reducing effectiveness.

Let's take actions that make sense for survival of ourselves and more importantly, wildlife and much needed plants and vegetation and not make decisions to line wealthy pockets.

Thank you for your time and consideration, Diane McCoy Palo Alto

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
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Thank you for your consideration.

Sincerely,

Diane McCoy

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COMMENT #122

PDF - City of Mountain View



PUBLIC WORKS DEPARTMENT
500 Castro Street, P.O. Box 7540
Mountain View, CA 94039-7540
650-903-6311 | MountainView.gov

October 14, 2024

Jaclyn Perrin-Martinez
Senior Climate Adaptation Planner
San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105

CITY OF MOUNTAIN VIEW COMMENTS ON THE DRAFT REGIONAL SHORELINE ADAPTATION PLAN

Dear Ms. Perrin-Martinez:

The City of Mountain View recognizes the coastal flood risks to our shoreline community along the San Francisco Bay. Sea levels are rising at an accelerating rate and are expected to continue rising for the foreseeable future, which will impact businesses, residents, and open spaces in the City's North Bayshore Area and beyond. The projected rise in sea levels prompted the City to develop a Sea Level Rise Capital Improvement Program (SLR CIP) in 2012, which was updated in 2022. While the City continues to plan and implement SLR CIP projects in Mountain View, sea level rise and increasing coastal flood risks are becoming more pressing regional issues.

The City of Mountain View supports the efforts of the San Francisco Bay Conservation and Development Commission (Commission) on sea level rise adaptation. The Draft Regional Shoreline Adaptation Plan provides a framework and specific guidelines for sea level rise adaptation, fostering regional collaboration in a consistent and coordinated approach. This is aligned with the City's long-standing commitment to sea level rise adaptation and collaboration across the region.

The City reviewed the draft Regional Shoreline Adaptation Plan and offers the following comments for consideration:

- **Section 3.1.3, Vulnerability Assessment Element C3:** Local governments could benefit from additional guidance on conducting economic impact analyses to estimate the cost of inaction. This additional guidance could improve the level of details and the consistency of the estimates and descriptions across the region.
- **Section 3.2.1, Coastal Flood Hazards and Sea Level Rise Scenarios Standard:** Table 3-1 summarizes the combined Coastal Flood Hazard and Sea Level Rise Requirements. The State of California Sea Level Rise Guidance, 2024 Science and Policy Update, Appendix 2, lists additional location specific sea level scenarios data. The City of Mountain View has prepared a number of studies and analyses to produce additional local fluvial and coastal hydraulic data. Some of these data could be lower than the minimum standards stated in

Section 3.2. These data were used as the basis of our SLR CIP. We look forward to discussing with the Commission on how we can incorporate these local specific data to the Subregional Plan.

- **Section 3.4.1, Local Government Planning Responsibilities:** Table 3-8 lists local agencies required to develop a Subregional Plan, but it does not include federal and state agencies, counties, and regional districts that may have properties along the shorelines or have a significant role in regional watershed and coastal management. Watersheds and sea level rise are not confined by geopolitical boundaries; inclusion of these entities could enhance the formulation of the multi-jurisdictional Subregional Plans and regional collaboration opportunities.
- **Section 3.4.2, Submitting Plans and Getting Approval:** A local jurisdiction may submit a Subregional Plan for review and approval by the Commission only after it has been formally adopted through a resolution. We suggest the Commission consider separating the review and approval process so that the Commission can work with a local agency to review and revise the Subregional Plan before it is formally adopted by the local government. The local government will then submit the reviewed and adopted Subregional Plan to the Commission for approval.
- **Question:** What is the mechanism for the Commission to enforce the preparation and implementation of the Subregional Plans?

Thank you for considering these comments. Please feel free to contact me if you have further questions at ed.arango@mountainview.gov or 650-903-6311.

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'E' and 'A' intertwined within a circular scribble.

Edward Arango

Acting Public Works Director

cc: CSD, APWD—Au, SCE—Wong

COMMENT #123

From: Kristin Mercer (tomercer@comcast.net) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Monday, October 14, 2024 10:05 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Stop building and intensifying uses on land we know will soon be threatened by flooding and groundwater rise. Building high-rises capable of standing in the water is pointless without access and utilities. Seawalls are proven unsustainable; instead we should plan for the eventual removal of existing structures and infrastructure as we retreat from rising sea levels and use natural marshes as buffer zones.

Developers on sea-level sites are profiting now while future residents bear the burden of removing flooded and toxic sites. City councils are too easily tempted by promised revenues. We need to stop the greed and ban development on the shoreline and former wetland landfill.

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

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* Expand Contamination Standards\nBroaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

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Thank you for your consideration.

Sincerely,

Kristin Mercer

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COMMENT #124

From: Chris MacIntosh <chrismac@alumni.upenn.edu>
Sent: Monday, October 14, 2024 11:15 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Cc: conservation@sequoia-audubon.com
Subject: Comment: Agenda item 8, October 17 meeting

Dear Commissioners,

I am a member of the Sequoia Audubon Society of San Mateo County, which works to protect birds and their habitats.

Thank you for all your work to develop the Regional Shoreline Adaptation Plan. This is an excellent and much-needed start to the work to secure the Bay and its environs for all of us.

I urge you to recognize that the Bay is as much at risk as communities are. Nature-based solutions provide many services that we human residents depend on, as well as offering flood resilience. Recommending and implementing nature-based solutions are necessary to keep Bay ecosystems alive. The tidal marshes along the Bay and sloughs, along with the mammals, birds, fish, invertebrates that use these and the deeper-water habitats are what will keep the Bay healthy for them and for humans. Please include the goal of 100,000 acres of wetlands in the priorities. This will still be a fraction of the wetlands that the Bay used to have. Per SB272, Nature-based solutions are required to the “greatest extent feasible” and should be considered and included *before* traditional hardscape solutions are employed.

Please emphasize and incorporate the concept of adaptive pathways. Changes to the ecosystem to address sea level rise will happen over time and not all at once. We humans tend to think that we install something and that is the way it will remain. For example, starting an oyster reef will be a small thing at first, but as the oysters increase their contribution to clean water will increase also.

In summary, Nature needs emphasis and input in every section of the plan guidelines, from existing conditions through the final plan and funding.

Thank you,

Chris MacIntosh

Redwood City, CA

chrismac@alumni.upenn.edu

COMMENT #125

From: Valerie Stewart (valeries4kids@aol.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Monday, October 14, 2024 12:25 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
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Thank you for your consideration.

Sincerely,

Valerie Stewart

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COMMENT #126

From: Chris MacIntosh (chrismac@alumni.upenn.edu) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Monday, October 14, 2024 2:54 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

I want to live here knowing that the Bay and its wildlife, from tiniest to largest, flora as well as fauna, are protected and will be kept healthy. This will benefit the health of me and other human residents.

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Chris MacIntosh

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COMMENT #127

From: Nancy Federspiel (nancyafeder2018@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Monday, October 14, 2024 5:04 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

As a long-time Bay Area resident, it is so exciting that in recent years we have been able to see endangered species such as humpback whales in San Francisco Bay - it's wonderful that our Bay is clean and healthy enough to support anchovies and other fish that are food for our favorite sea mammals. However, with new challenges due to climate change and sea-level rise, we must advance nature-based solutions to protect and build the Bay ecosystems that provide essential services for our own well-being as well as for all those who live in/near the Bay. The RSAP is a terrific start to planning our adaptive responses, but there is still work to be done. Please address the gaps as described below and make sure that regional planning prioritizes ecosystem health, natural resilience, and contamination safety throughout the Bay Area.

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Nancy Federspiel

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COMMENT #128

From: LAARNI VON RUDEN (laarnivonruden@sbcglobal.net) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 9:21 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

As a lifetime member of the Sierra Club, I work with them to assure the environmental health for now and the future. I try to make good choices in my life and this is one of them. Please consider environmental effects on plants and animals and our waters. Thank you, Laarni

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
To sustainably and cost-effectively protect the Bay Area, please consider the following:

1. Prioritize ecosystem health and NNBS at every step
NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems?essential to our communities, our economy, and global biodiversity?are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

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SLR poses significant contamination risks from toxic sites and landfills along the shoreline. While the RSAP includes a narrow standard for reducing contamination risks due to flooding in socially vulnerable, environmental justice (EJ) communities, it fails to address non-emergent groundwater rise and soil disruption related to adaptation projects themselves. The RSAP currently also lacks any contamination Standard for non-EJ communities.??

* Expand Contamination Standards
Broaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

4. Define Metrics for Habitat Goals

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Thank you for your consideration.

Sincerely,

LAARNI VON RUDEN

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COMMENT #129

From: Carol Schaffer (cschaff@aol.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 10:07 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Carol Schaffer

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COMMENT #130

From: Maureen Fry (msfryohio@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 10:09 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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COMMENT #131

From: Daniel Kline (inklined2@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 10:09 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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COMMENT #132

From: Maureen Fry (msfryohio@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 10:10 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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COMMENT #133

From: Mary Hicken (mary@hickens.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 10:14 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Thank you for listening to my and others voices calling for the support and protection of our Bay waters, ecosystems and communities.

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

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Thank you for your consideration.

Sincerely,

Mary Hicken

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COMMENT #134

From: Jeffrey Hemenez (jh2897@att.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 10:14 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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Jeffrey Hemenez

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COMMENT #135

From: Kathy Silvey (kjsilvey@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 10:14 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

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COMMENT #136

From: Christy Seaman (christysea77@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 10:15 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

This is extremely important for all of us in the Bay Area. Please take action now!

Dear BCDC Commission,

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contamination risks due to flooding in socially vulnerable, environmental justice (EJ) communities, it fails to address non-emergent groundwater rise and soil disruption related to adaptation projects themselves. The RSAP currently also lacks any contamination Standard for non-EJ communities.??

* Expand Contamination Standards\nBroaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

4. Define Metrics for Habitat Goals

The RSAP includes a Standard that requires protection, restoration, and/or enhancement of Baylands habitats to "meet habitat goals," but these goals are neither defined or quantified.?

* The RSAP should establish clear, measurable habitat goals and require each local plan to specify how it will contribute to them, and BCDC should monitor and report on progress toward these targets to ensure accountability and success.

This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

Christy Seaman

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #137

From: Madeleine Malayan (mimimalayan@yahoo.com) Sent You a Personal Message <kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 10:18 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
To sustainably and cost-effectively protect the Bay Area, please consider the following:

1. Prioritize ecosystem health and NNBS at every step
NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems are essential to our communities, our economy, and global biodiversity. They are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

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2. Clarify requirements and emphasize ecosystem health standards
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Thank you for your consideration.

Sincerely,

Madeleine Malayan

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COMMENT #138

From: Nann White (nannwhite56@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 10:21 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

We need wetlands for resilience and for the fowl. We know this and we need to act now to remedy the mess we have made by infill over the centuries. Please be wise and think to the future.

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
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Thank you for your consideration.

Sincerely,

Nann White

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COMMENT #139

From: Matt Williams (mwillia@mac.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 10:25 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Matt Williams

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COMMENT #140

From: Susan Green (green.susan.s@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 10:28 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Susan Green

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COMMENT #141

From: Kevin Schader (now_what17@yahoo.com) Sent You a Personal Message

<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 10:36 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Kevin Schader

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COMMENT #142

From: Anthony L. Barreiro (anthonybarreiro@yahoo.com) Sent You a Personal Message <kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 10:38 AM

To: BCDC PublicComment <publiccomment@bcdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

I grew up in Hayward. I live in San Francisco. I visit the bayshore regularly and I sail on the bay as an educational volunteer with Call of the Sea out of Sausalito.

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
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Thank you for your consideration.

Sincerely,

Anthony L. Barreiro

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COMMENT #143

From: Max Pricco (max@maxpricomusic.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 10:40 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Max Pricco

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COMMENT #144

From: Marina Marcroft (marinamarcroft@msn.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 10:41 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Marina Marcroft

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COMMENT #145

From: Stephanie Rouse (bug54@sbcglobal.net) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 10:42 AM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Thoughtful planning for climate change adaptations are crucial, and I am grateful that natural and nature-based strategies are recognized by the Army Corps of Engineers as also being cost effective in the long run for sea level resiliency in our baylands.

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
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To sustainably and cost-effectively protect the Bay Area, please consider the following:

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* Expand Contamination Standards
Broaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

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Thank you for your consideration.

Sincerely,

Stephanie Rouse

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #146

From: SARAH SCHOELLKOPF (sarah.schoellkopf@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 10:44 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

SARAH SCHOELLKOPF

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COMMENT #147

From: Ernie Walters (ernwalt@aol.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 10:45 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Ernie Walters

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COMMENT #148

From: Nancy Havassy (n.havassy@att.net) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 10:46 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Thank you for your consideration.

Sincerely,

Nancy Havassy

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COMMENT #149

From: Mike Cass (mike_e_cass@yahoo.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 10:47 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Thank you for your consideration.

Sincerely,

Mike Cass

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COMMENT #150

From: James R Monroe (randy@monroescienceed.com) Sent You a Personal Message <kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 10:47 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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Sincerely,

James R Monroe

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COMMENT #151

From: Lorenzo Bavoso (bavoso@att.net) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 10:53 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

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Thank you for your consideration.

Sincerely,

Lorenzo Bavoso

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COMMENT #152

From: Ernest Walters (ernwalt@comcast.net) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 10:55 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Sincerely,

Ernest Walters

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COMMENT #153

From: Michael Price (mp969@comcast.net) Sent You a Personal Message

<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 10:56 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

Michael Price

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #154

From: Alexander Vollmer (abvollmer@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 10:57 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
To sustainably and cost-effectively protect the Bay Area, please consider the following:

1. Prioritize ecosystem health and NNBS at every step
NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems are essential to our communities, our economy, and global biodiversity. They are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

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2. Clarify requirements and emphasize ecosystem health standards
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3. Strengthen Groundwater and Contamination Standards
SLR poses significant contamination risks from toxic sites and landfills along the shoreline. While the RSAP includes a narrow standard for reducing contamination risks due to flooding in socially vulnerable, environmental justice (EJ) communities, it fails

to address non-emergent groundwater rise and soil disruption related to adaptation projects themselves. The RSAP currently also lacks any contamination Standard for non-EJ communities.??

* Expand Contamination Standards\nBroaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

4. Define Metrics for Habitat Goals

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Thank you for your consideration.

Sincerely,

Alexander Vollmer

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COMMENT #155

From: Britton Pyland (daigen2021@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 11:02 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Britton Pyland

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COMMENT #156

From: Christopher Ware (cmdubb@yahoo.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 11:04 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Christopher Ware

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COMMENT #157

From: Rita Poppenk (ritap510@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 11:13 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Rita Poppenk

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COMMENT #158

From: Marjory Keenan (marjkeenan44@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 11:18 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Marjory Keenan

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COMMENT #159

From: Susan Williard (dancegirl@earthlink.net) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 11:21 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Susan Williard

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COMMENT #160

From: Susan Abby (mssueabby@aol.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 11:38 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Susan Abby

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COMMENT #161

From: H Leabah Winter, MPH (hlwinter@comcast.net) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 11:38 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

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Thank you for your consideration.

Sincerely,

H Leabah Winter, MPH

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COMMENT #162

From: Mark Zier (markzier@sbcglobal.net) Sent You a Personal Message

<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 11:50 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

One of my measures of ecosystem health has been the presence of bees and humming birds in the neighborhood. Once common, over the past decade or so, they have nearly all disappeared. I hope that your efforts will reverse that trend.

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
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This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

Mark Zier

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #163

From: LIII D (msldill@yahoo.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 11:52 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
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Thank you for your consideration.

Sincerely,

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COMMENT #164

From: B Sandow (bysandow@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 11:54 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

B Sandow

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COMMENT #165

From: Lynne Slater (she_chela@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 12:11 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

I trust you to act in alignment with your highest values for the benefit of all living things!

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Lynne Slater

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COMMENT #166

From: leslie smith (lplatosmith@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 12:13 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

leslie smith

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #167

From: David Ferguson (ddferg@sbcglobal.net) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 12:19 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Thank you for your consideration.

Sincerely,

David Ferguson

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COMMENT #168

From: Joan Nygaard (glennwoodec@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 12:47 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Thank you for your consideration.

Sincerely,

Joan Nygaard

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COMMENT #169

From: Golda Michelson (goldamft@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 1:00 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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COMMENT #170

From: Alan Schwartz (aschwartz.news@bbti.us) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 1:02 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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Sincerely,

Alan Schwartz

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COMMENT #171

From: Mary Belshe (mary@belshe.org) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 1:09 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

These priorities and improvements will help us preserve and hopefully renew things about the Bay Area and California that we love and that are easy to take for granted. But the time has come to recognize the damage that has already been done and to do everything possible to restore and preserve the ecosystems that influence us in so many ways.

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
To sustainably and cost-effectively protect the Bay Area, please consider the following:

1. Prioritize ecosystem health and NNBS at every step
NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems?essential to our communities, our economy, and global biodiversity?are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

* The RSAP should prioritize Baylands health by making NNBS and habitat ecosystems core considerations for every aspect of SLR plan development. As an example, mapping of opportunities for NNBS, including habitat migration, should be included in the checklists for each Strategic Regional Priority.

2. Clarify requirements and emphasize ecosystem health standards
Inconsistent reference to requirements between and among the Vision Statements, the ?required assets and actions? in Section 2, and the Standards in Section 3 may create confusion and hinder progress. Much like the equity assessment, Ecosystem health Standards should be explicitly required in each RSAP element and checklist, ensuring clarity, compliance, and successful implementation.

3. Strengthen Groundwater and Contamination Standards
SLR poses significant contamination risks from toxic sites and landfills along the shoreline. While the RSAP includes a narrow standard for reducing contamination risks due to flooding in socially vulnerable, environmental justice (EJ) communities, it fails to address non-emergent groundwater rise and soil disruption related to adaptation projects themselves. The RSAP currently also lacks any contamination Standard for non-EJ communities.??

* Expand Contamination Standards
Broaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

4. Define Metrics for Habitat Goals

The RSAP includes a Standard that requires protection, restoration, and/or enhancement of Baylands habitats to "meet habitat goals," but these goals are neither defined or quantified.?

* The RSAP should establish clear, measurable habitat goals and require each local plan to specify how it will contribute to them, and BCDC should monitor and report on progress toward these targets to ensure accountability and success.

This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

Mary Belshe

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COMMENT #172

From: michelle dunn (horsepoop007@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 1:44 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Thank you for your consideration.

Sincerely,

michelle dunn

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COMMENT #173

From: Judy MacLean (judymac@igc.org) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 1:49 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

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Thank you for your consideration.

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Judy MacLean

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COMMENT #174

From: William Chaney (billchaney6@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 1:50 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

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Thank you for your consideration.

Sincerely,

William Chaney

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COMMENT #175

From: Kevin Jensen (kevin.w.jensen@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 2:27 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Thank you for your consideration.

Sincerely,

Kevin Jensen

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COMMENT #176

From: Erin Foret (erinforet@yahoo.com) Sent You a Personal Message

<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 2:30 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

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Thank you for your consideration.

Sincerely,

Erin Foret

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COMMENT #177

From: Terry Potente (tpotente@ameritech.net) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 2:34 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

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Terry Potente

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COMMENT #178

From: Joslyn Baxter (joslyn.baxter@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 3:12 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

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Sincerely,

Joslyn Baxter

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COMMENT #179

From: John Oda (jandjoda@aol.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 3:28 PM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

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* Expand Contamination Standards
Broaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

4. Define Metrics for Habitat Goals

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* The RSAP should establish clear, measurable habitat goals and require each local plan to specify how it will contribute to them, and BCDC should monitor and report on progress toward these targets to ensure accountability and success.

This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

John Oda

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #180

From: Susanne Herting (sbherting@gmail.com) Sent You a Personal Message

<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 3:46 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
To sustainably and cost-effectively protect the Bay Area, please consider the following:

1. Prioritize ecosystem health and NNBS at every step
NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems are essential to our communities, our economy, and global biodiversity. They are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

* The RSAP should prioritize Baylands health by making NNBS and habitat ecosystems core considerations for every aspect of SLR plan development. As an example, mapping of opportunities for NNBS, including habitat migration, should be included in the checklists for each Strategic Regional Priority.

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Thank you for your consideration.

Sincerely,

Susanne Herting
4088 Patterson Ave
Oakland, CA 94619
sbherting@gmail.com
(510) 325-3900

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #181

From: Raquel Narvios (ssalino@sbcglobal.net) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 3:49 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

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Thank you for your consideration.

Sincerely,

Raquel Narvios

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #182

From: Paulette Langguth (pl2gs@sbcglobal.net) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 3:55 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Paulette Langguth

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #183

From: Diana Bohn (nicca@igc.org) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 3:56 PM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Diana Bohn

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #184

From: Sue Hall (otterone77@aol.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 4:00 PM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Sue Hall

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COMMENT #185

From: Diana Bohn (nicca@igc.org) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 4:11 PM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Prioritize Ecosystem Health, Natural Resilience, and Contamination Safety in the RSAP.

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
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Thank you for your consideration.

Sincerely,

Diana Bohn

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COMMENT #186

From: Farhad Farahmand (farhad.farahmand@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 5:40 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Please save our wetlands, they are crucial to support biodiversity.

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

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Thank you for your consideration.

Sincerely,

Farhad Farahmand

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COMMENT #187

From: Judy Rogers (healingspringjr@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 5:43 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Judy Rogers

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COMMENT #188

From: Lynda Caesara (lcaesara@hotmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 5:51 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Our Bay is precious. Please support it's health, and the halth of our communities,.

Dear BCDC Commission,

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However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement\nTo sustainably and cost-effectively protect the Bay Area, please consider the following:

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Thank you for your consideration.

Sincerely,

Lynda Caesara

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #189

From: Andrea Schauer (lalischauer@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 5:53 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

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Thank you for your consideration.

Sincerely,

Andrea Schauer

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COMMENT #190

From: Carol Bostick (lunagata8@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 7:32 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Carol Bostick

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COMMENT #191

From: Ginny Madsen (madsenginny3@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 8:41 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

I am an elderly woman, whose family has been in the East Bay since the 1880's. I graduated from San Jose State with a BS in Geology and Chemistry in 1983. I have lived and worked, had friends and family, in almost every part of the Bay and have known many parts of the shoreline intimately in various times in my life. Back in the 1970's my mother and my baby sister both were passionate advocates for Save The Bay, they both passed away long ago, but I am still inspired to speak up because of them. I have lived near the San Leandro shoreline since 2005 and watched the changes occurring there with my geologist's eye and my climate change aware understanding I try hard to stay on top of plans for changes on the shoreline here because I have learned that many of the people making those plans do NOT believe that climate change or sea level rise is occurring AND come from the mindset which would have made San Francisco Bay a concrete channel back in the 1960's.

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Ginny Madsen

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COMMENT #192

From: Cynthia Eagleton (zimzamjamz@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 9:04 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Water Always Wins by Erica Gies lays out why this is so important!!

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Cynthia Eagleton

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COMMENT #193

From: Ileana Soto (laniluisa@comcast.net) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 9:14 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Our beloved Bay and cities around it need to recognize the scientific sense of using natural systems to combat sea level rise. Look to the Sierra Club for answers.

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Ileana Soto

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COMMENT #194

From: Birgit Hermann (bhermannsf@aol.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Tuesday, October 15, 2024 9:53 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Thank you for your consideration.

Sincerely,

Birgit Hermann

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COMMENT #195

PDF - Ginny Madsen

From: Ginny Madsen
To: BCDC PublicComment
Subject: Comment to RSAP re Long Beach restoration
Date: Tuesday, October 15, 2024 10:22:28 PM
Attachments: Long Beach Community Meeting #2 July 11 2024 Final-1.pdf

Some people who received this message don't often get email from madsenginny3@gmail.com. [Learn why this is important](#)

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

My name is Ginny Madsen and I am commenting on the Regional Shoreline Adaptation Plan because I believe that observations I have made as an educated resident should be considered by the BCDC. This is a second comment containing specifics about another project planned by the City of San Leandro which will impact the Bay shoreline and, I believe, affect not just neighboring jurisdictions' shorelines, but the whole Bay. The BCDC needs to know about this and an RSAP that will really Save the Bay for all of us needs to elucidate a perspective that one jurisdiction's sea wall will affect another jurisdiction's flood risk. It is difficult, but I believe the RSAP needs to define a pathway to a better understanding of sediment movement in the Bay as a whole, as well as try to come up with metrics for assessing what is destructive for one jurisdiction to do.

I am an elderly woman, whose family has been in the East Bay since the 1880's and who grew up in Livermore. I graduated from San Jose State with a BS in Geology and Chemistry in 1983. I have lived and worked, or had friends and family, in almost every part of the Bay and have known many parts of the shoreline intimately in various times in my life. I have lived near the San Leandro shoreline since 2005 and watched the changes occurring there with my geologist's eye and my climate change aware understanding, trying hard to stay aware of plans for changes on this shoreline because I learned soon after moving here that many of the people making those plans do NOT believe that climate change or sea level rise is occurring AND come from the mindset which would have made San Francisco Bay a concrete channel back in the 1960's. They think they OWN part of the Bay and can do with it what they want. BCDC was established to counteract that kind of thinking. And the RSAP needs to be a deterrent.

I think it was back in 2007 when I saw a 1915 postcard displayed by the Historical Society at the Main Library showing 3 daintily dressed women lounging on the "white sand beach" of San Leandro located at the end of Davis Street. The end of Davis Street was a County dump site back in the 1950's and 1960's (I rode in my dad's pickup to drop stuff off there) which has since been buried and made into a park in the East Bay Regional Parks district. Just before I saw that postcard, I had walked on that enormous mound and pondered the 6 foot metal capped outgassing vents I found by going off the pathways. It was clear that any white sand beach in that section of shoreline had been obliterated forever. When I made a public comment about it at a very well attended City Planning meeting shortly thereafter was stunned and unprepared when the room erupted in applause because it was the first time I witnessed any awareness in San Leandro that harm had been done to the Bay shoreline. But residents knew.

I knew that Long Beach was another stretch of sandy shoreline south of San Leandro Marina and golf course which got 'washed out' in strong storms in the winter of 2018. So when I got a call from a friend about a meeting happening within 4 hours on November 7 2023 regarding

the section of “Bay shoreline called Long Beach by locals”, I made a point of being one of the 10 people there. I tried to circulate what I learned to people in the Friends of San Lorenzo Creek and Friends of San Leandro Creek, but when the follow up meeting occurred this past July 11 2024, there were only 6 people in attendance – and I only found out about it because another acquaintance emailed me asking me to go. The study and both presentations were done by Environmental Design Associates with funding from San Francisco Bay Restoration Authority.

The outreach from the November 2023 meeting was summarized by the City as:

1. Suggestion for a regional approach/coordination of shoreline projects
2. Proposed repair to make provisions for the return of steelhead trout and salmon because of observed recent runs of these species in San Lorenzo Creek
3. Most attendees favored nature-based remediation and gradual slope embankment for the proposed mitigations
4. Short-term repairs (lasting less than 10yrs) should be removed from mitigation options

Yet, in the July 2024 presentation (which is attached to this email because it is no longer available on the City's website) I want to call your attention to the slide on page 34 recommending rebuilding the berm with trucked in sand punctuated by multiple, large rock buttresses which come close to being a hardscape seawall in my perception. The rationale given for the manual reconstruction of the old berm with trucked in sand and hardscape was the rarity of sandy beaches on the Bay shoreline.

Shortly after the July 2024 meeting I emailed the following to the City Engineer in charge of the project (Austine Osakwe on July 25, 2024) but have never heard anything back.

"I have to tell you that I am increasingly more concerned about the health of the marshes behind Long Beach and continue to try to understand how rebuilding Long Beach will improve the tidal circulation and help the marshes.

And I have to say that I continue to wonder why we are not considering something along the lines of the Oro Loma Horizontal Levee which exists just south of the Long Beach project area on the other side of the Bockman Channel. <https://www.sfestuary.org/first-mile-horizontal-levee/>

I understand the plans described as dominated by hardscape but don't yet believe that they are best for the Bay, the marshland or for protecting the neighborhoods inland from the Bay from sea level rise. I think we need to look at more nature-based, green engineering options not just what is basically a Long Beach sea wall.“

Engineers want to build hardscape and the RSAP needs to take a stand – and provide examples – of nature based alternatives. There is quite a bit of infrastructure and pre-existing contamination that exists in this area which should be the concern of BCDC. And the RSAP should provide some guidelines for how BCDC can bring a regional perspective to decisions about what happens here because of what lies behind and around this area. The RSAP needs to give some indication of how the BCDC will interact with all of the jurisdictions and agencies which are stakeholders in this particular part of the Bay. The BCDC could mediate / moderate between the City and all of the different entities involved here in exchange for having a say in what happens here. I see this as the ONLY way the Bay, the shoreline AND the infrastructure will remain resilient.

I have collected a lot of information about this area of the Bay from many sources that I think would be of interest to BCDC, but am afraid I would write too much for you to read here. So am going to try to briefly summarize what I consider to be highpoints about Long Beach below. I have reference documents if you are interested.

- There are 10 separately named marshes adjacent to Long Beach that are drained by the Roberts Landing Slough. The Southern Pacific rail line and residential neighborhoods line the eastern, inland side of these marshes. The Estudillo Canal marks the northern boundary and the San Lorenzo Creek Canal marks the southern boundary.
- The Army Corps of Engineers dug both the Estudillo Canal and San Lorenzo Creek Canal in the 50's and manage the Dredge Materials Management site at the northern most 'marsh' inland from the Tony Lema Golf Course and next to the Estudillo Canal. There is a rip rap hardscape bordering the golf course shoreline and the City's Marina park.
- There are EXTENSIVE, shallow sand shoals, tidal deltas and sediment flats just off the shoreline. This part of the Bay gets a lot of sand because of deposition patterns which need to be understood.
- The Long Beach berm that washed out in 2019 was basically the remnants of an old road along the shoreline that was used to access the Trojan Powder Works explosives manufacturing site circa 1904. The road may have already existed prior to that business. Concrete bunkers and toxic remains still exist in the marsh called Bunker Marsh just behind Long Beach.
- In 1953 the Army Corps of Engineers dug the San Lorenzo Creek Channel and Estudillo Canal Channels that exist today but **prior to that the San Lorenzo Creek emptied into the Bay at the site of Long Beach.**
- There was a bridge over the San Lorenzo Creek inland from Long Beach that was used by the nearby Southern Pacific rail line dating from the 1880's.
- **Ohlone shellmounds were mapped nearby** in 1972. (from Origin and Nature of the Blue Bird Dump Site, 1992).
- The Bay Trail turns inland just above Long Beach and skirts Bunker, East and Long Beach Marshes before returning to the bayshore along the San Lorenzo Creek Channel.
- The large waste water pipeline managed by the East Bay Dischargers Authority runs about 100 feet behind the current Long Beach shoreline but is buried some 11 feet underground. (see pg 23 in attached presentation)

I am sorry for the length of this communication but could NOT decide what to leave out. But details are important when it comes to complex ecosystems like the Bay shoreline. I pray that BCDC can always keep details in mind, and that the RSAP can outline a way to annotate them, monitor them and assess them. Because doing so is what will make the Bay's shoreline, and the Bay, resilient and alive. To Save the Bay, we need to bring about public understanding of the Bay as an entity in which all Bay Area residents share responsibility and must cooperate to enjoy the benefits.

Community Meeting

Long Beach Shoreline Restoration



July 11, 2024

Environmental Science Associates and City of San Leandro

Agenda (~1.5-hours)

- Meet the Project Team (5 minutes)
- Project Introduction (30 Minutes)
 - Background & Project Context
 - Coastal Processes and Sand Migration
 - Project Goals & Objectives
- Conceptual Design Development (30 Minutes)
 - Design Alternatives
 - Evaluation Criteria
 - Draft Alternatives Analysis & Recommended Alternative
 - Next Steps
- Questions and Discussion (25 Minutes)

Introductions

- **Project Lead:** City of San Leandro
 - Austine Osakwe
- **Technical Advisor Group**
 - Peter Baye, Independent Consultant (Restoration Ecology)
 - Roger Leventhal, Marin County DPW
 - Jeremy Lowe, SFEI
 - Heidi Weiskel, UC Davis
- **Technical and Design Consultant:** Environmental Science Associates (“ESA”)
 - Project Director: Louis White
 - Project Manager: Eddie Divita
- **Funding:** San Francisco Bay Restoration Authority

Technical Studies and Project Planning Completed to Date

Physical Conditions Studies

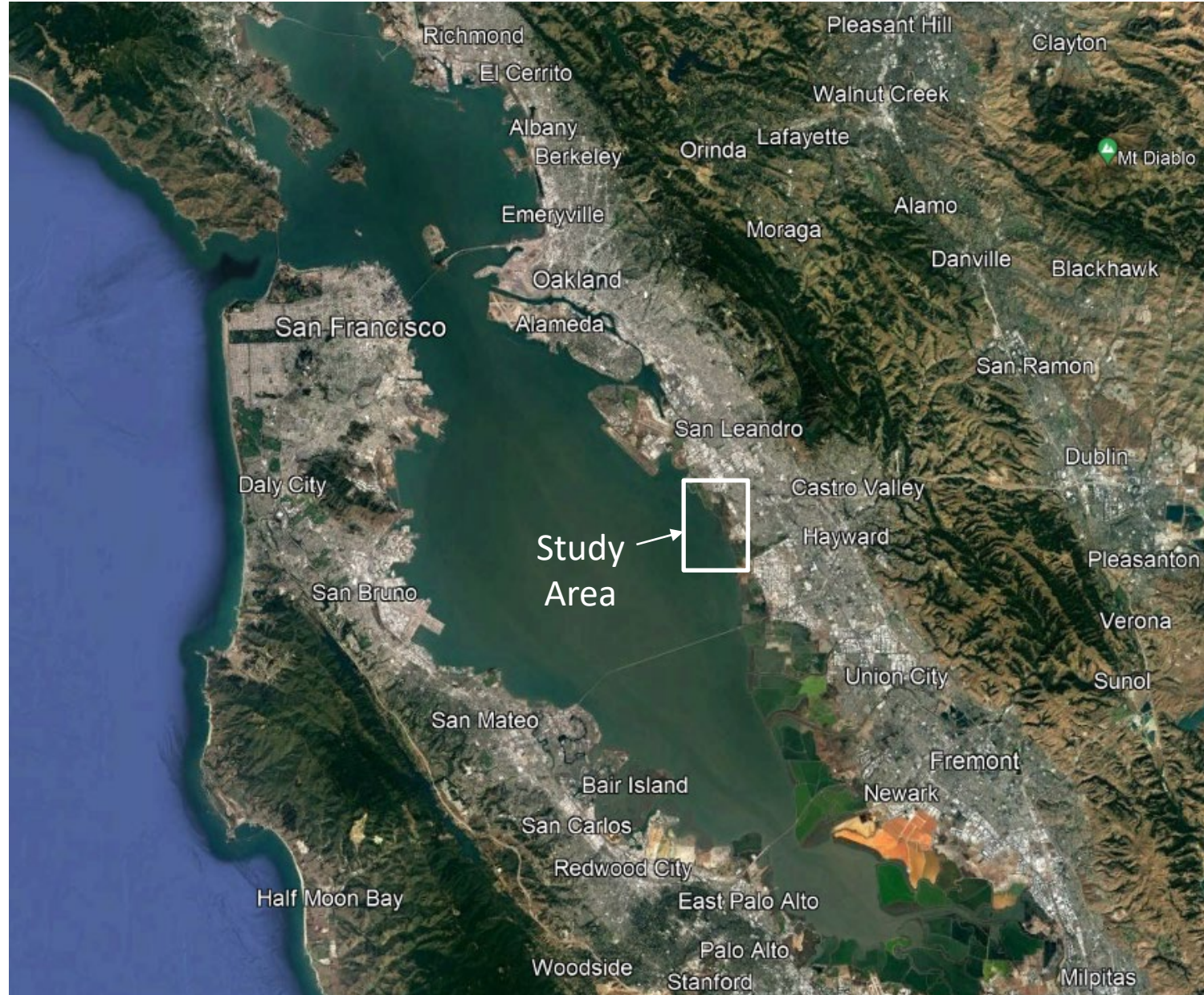
- Background Data Report
- Data Collection
 - Topography and Bathymetry Surveys
 - Wave Measurements
- Geomorphic Assessment
- Sediment Budget
- Local Wave Study

Project Planning/Design Development

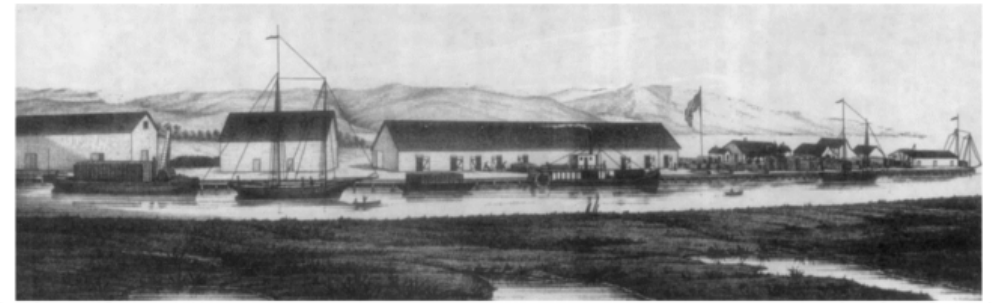
- Conceptual Model
- Goals and Objectives
- Alternatives Evaluation



Study Area

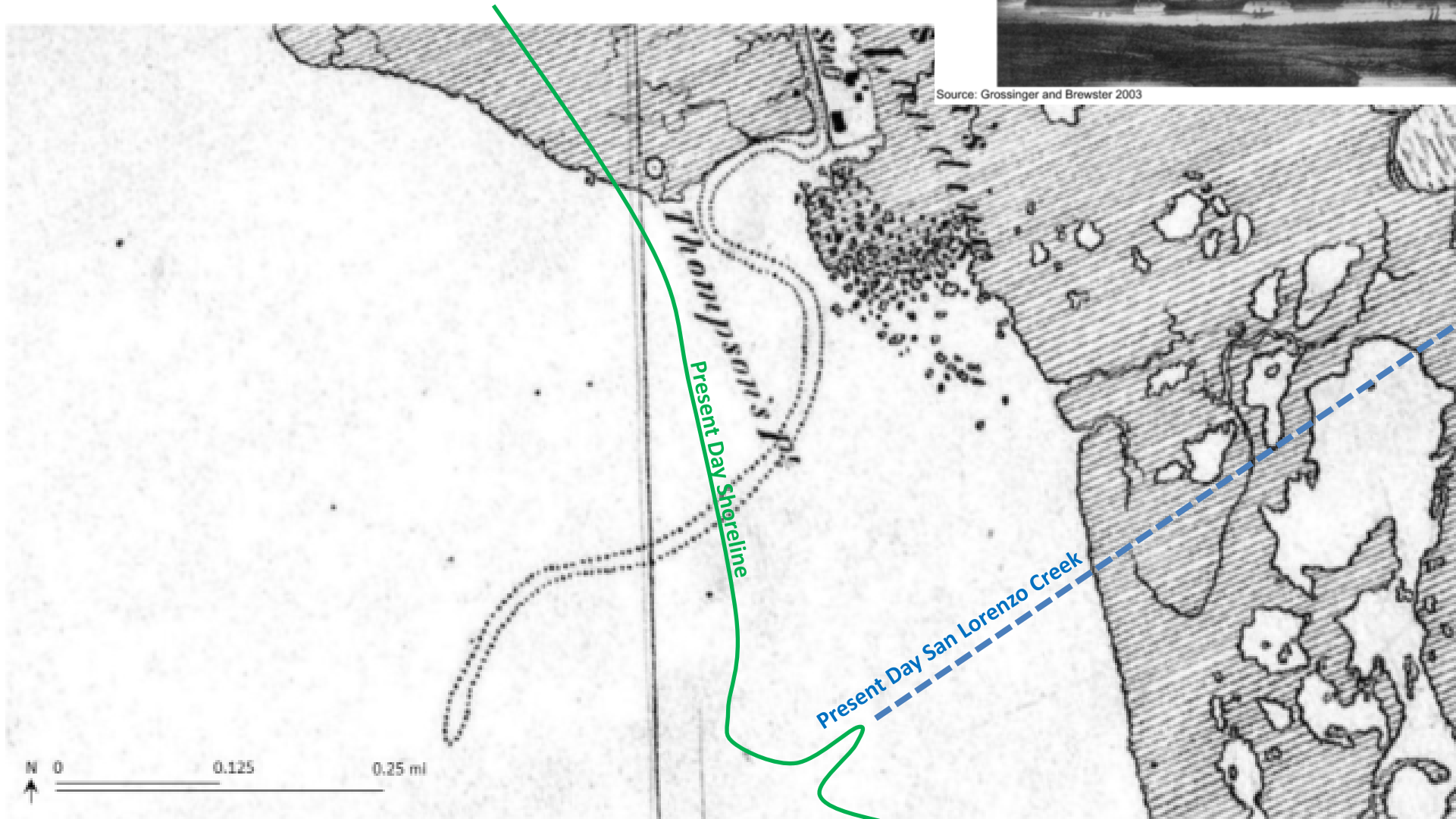


Historic Conditions (1857)



Source: Grossinger and Brewster 2003

Long Beach Restoration Project



Source: NOAA 2016

Long Beach Restoration Project

Figure 10

T-Sheet 635, 1857



Long Beach Shoreline

Key Landforms and Features

- Entire San Leandro Bay Shore was extensively modified by levee construction in early 1900s
- “Long Beach” is the south end of the San Leandro Shoreline Marshlands
 - ~3,500 feet of natural shoreline
 - Connection for 300 acres of tidal marsh to SF Bay
- North Limit: SF Bay Trail Levee
- South Limit: San Lorenzo Creek



Existing Habitats and Infrastructure



Source:
Resilience Atlas (SFEI 2023)

2018/2019 Breach

Feb 2018



Source: City of San Leandro.

Aug 2019



Long Beach Restoration Project

May 2023



Figure 27
Breach Area, Looking North. 02-03-2018 (left) and 08-18-2019 (right)

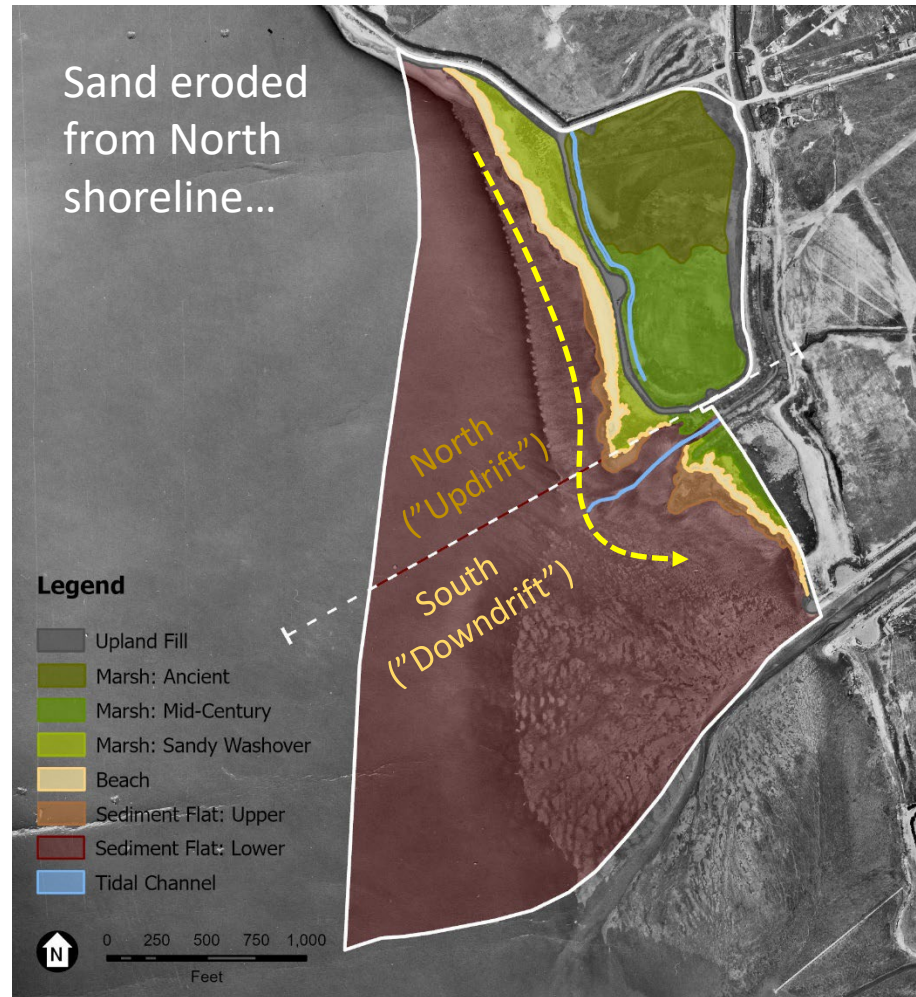
Summary of Background Conditions

- Study Area used to have ~3000+ feet of sandy beach habitat, and 70+ acres of tidal marsh habitats
 - Beach and marsh are rare and valuable habitat types in SF Bay
- Sand volume has decreased, leading to erosion and breach at Bunker Marsh
 - Loss of ~50% of beach habitat area
 - Disrupted tidal circulation to Bunker Marsh
 - Starting to observe erosion of tidal marsh habitat
 - No significant effects on Bay Trail, infrastructure, flood risk
- The City received grant funding in 2021 to restore beach habitat improve coastal habitat resilience
- ESA has evaluated the processes contributing to the loss of sand, and has developed a recommended alternative to restore the sandy beach

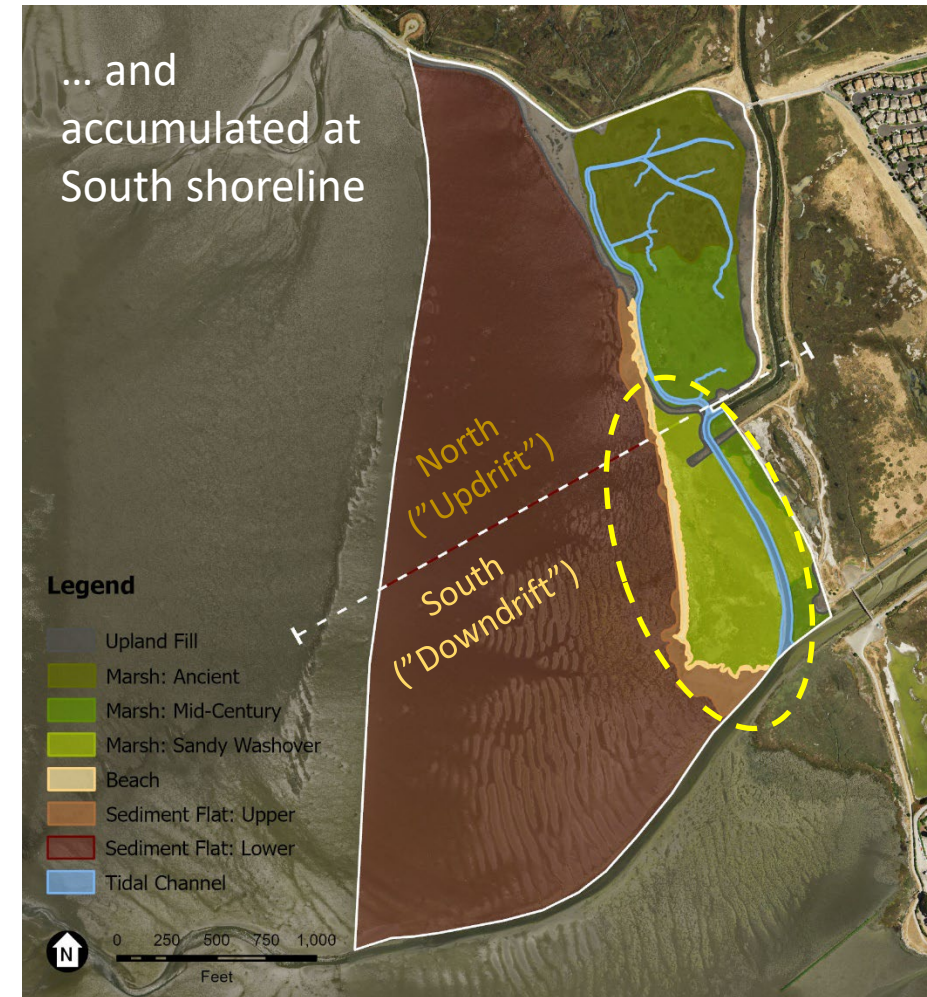
Coastal Processes and Sand Migration



Historic Sand Migration at Long Beach



1965

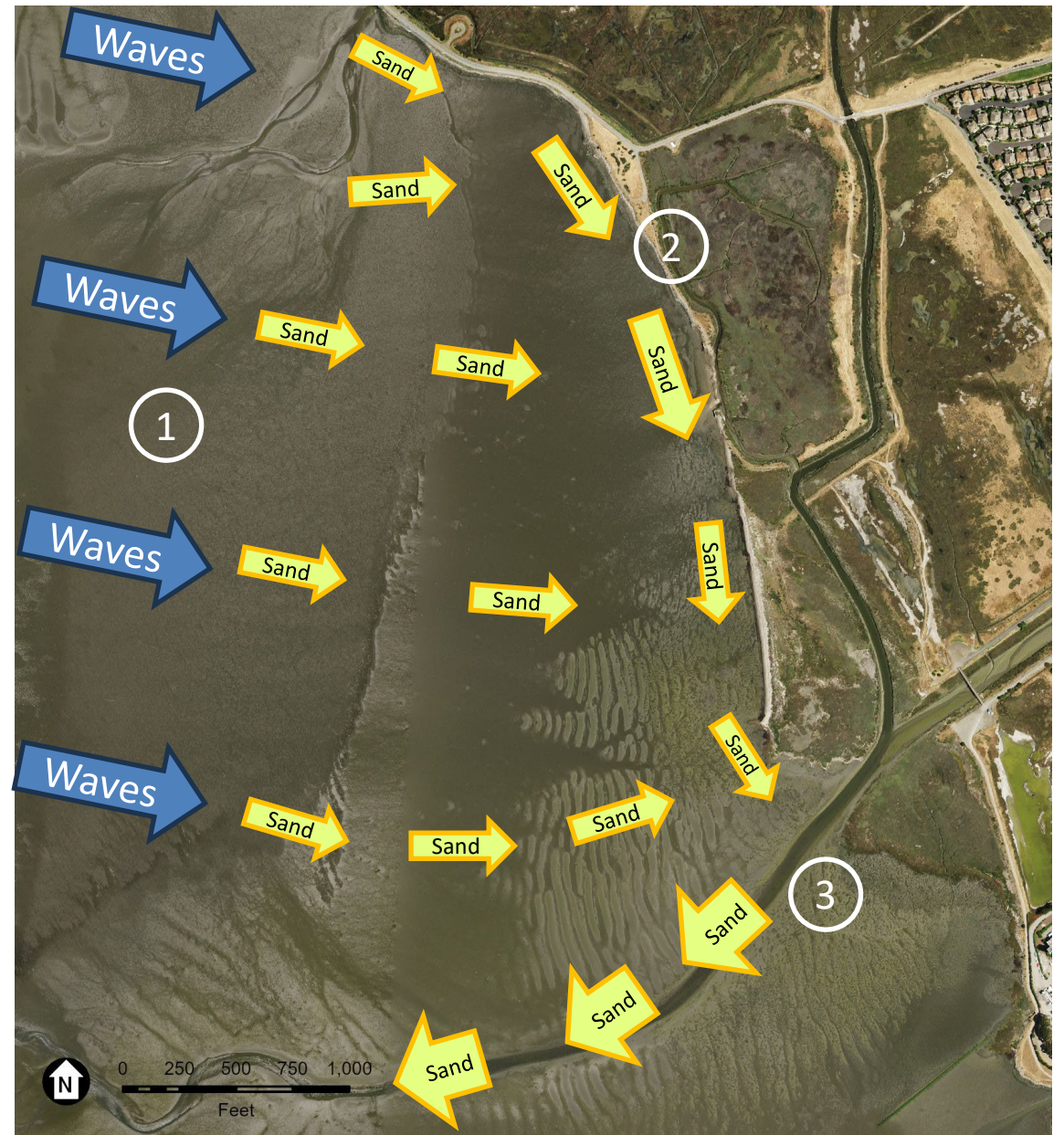


2020

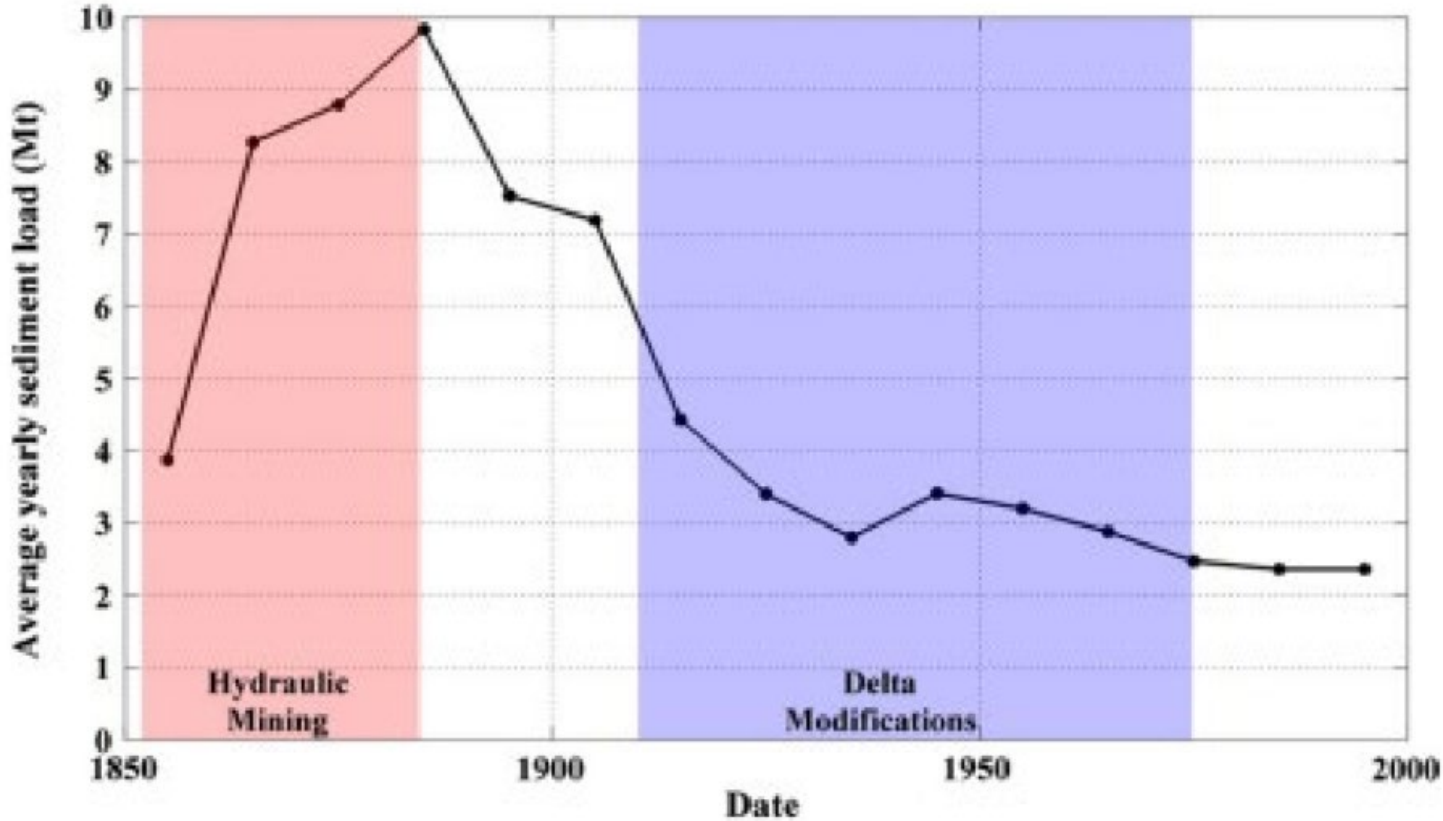
Sand Movement Near Long Beach (A “Cartoon” Model)

Waves Move the Sand

1. Offshore waves push sand towards the shoreline (towards the east)
2. Nearshore waves push sand along the shoreline (towards the south)
3. The San Lorenzo Creek channel captures sand moving southwards and pushes it offshore



Regional Context: Decreasing Sediment Supply



- SF Bay has received “pulses” of sediment from the Gold Rush and subsequent shoreline construction.
- These pulses have now mostly moved out of the estuary, and sediment supply in Bay is now lower than recent historic levels.

Fig. 4. Reconstructed decadal sediment load from the Sacramento and San Joaquin rivers (from Ganju et al., 2008, using bulk density estimates of 529 kg/m³ per Schultz, 1965; Krone, 1979), with the major periods of hydraulic mining (1852–1884) and Delta modifications (1910–1975) highlighted.

Source: Barnard et al., 2013.

Long Beach Restoration Project

Figure 53

Reconstructed Decadal Sediment Load from the Sacramento and San Joaquin Rivers

Changing Volumes of Sand at Long Beach

1920 to 1965

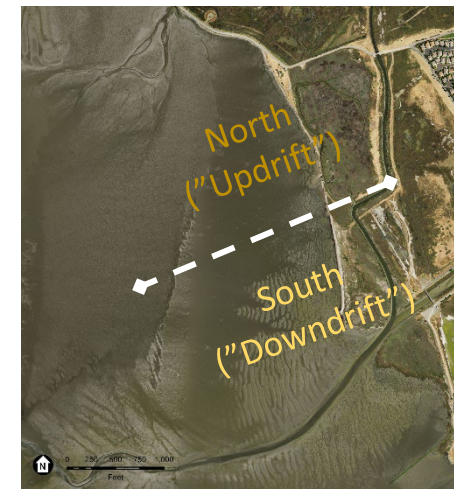
- Lots of shoreline construction
- Was not a “naturally evolving” landscape

From 1965 to 2010

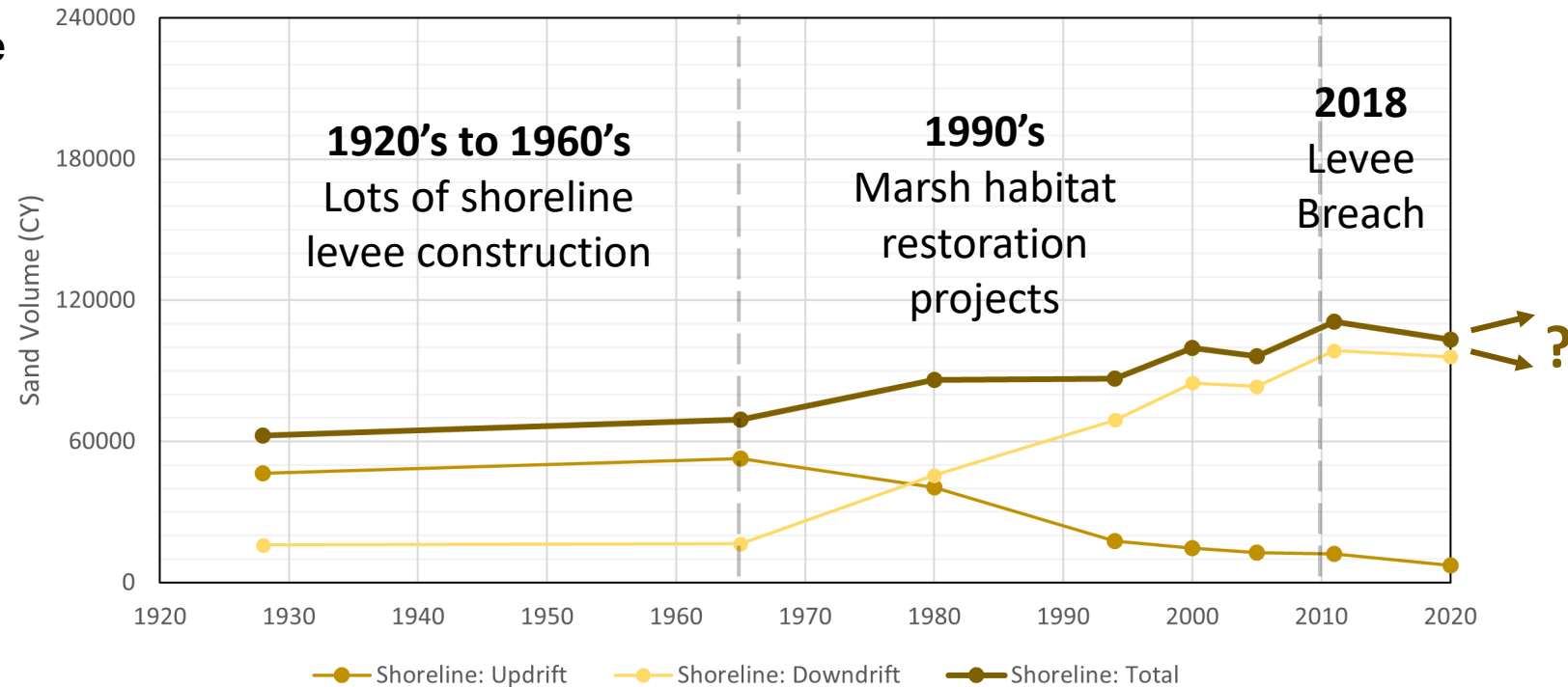
- Erosion at Northern shoreline
- Accumulation at Southern shoreline
- Relocation of San Lorenzo Ck Mouth
- Net accumulation

Did conditions change between 2010 and 2020?

- Did the levee breach alter coastal processes?
- Are there regional trends affecting sand movement?
 - Dredging / Construction
 - Climate change & drought
- Little net change(?)



Dynamic Shoreline Sand Volume
(Beach, Marsh: Sandy Washover, Sediment Flat: Upper)





Project Goal

To protect, enhance, restore, and manage the habitats and dynamic landforms of the site's tidal flats, beach and marshes using nature-based techniques that can adapt to sea-level rise while maintaining low-intensity public access to the shore.

Project Objectives

- 1. Enhance existing ecological resources by promoting sandy-beach high marsh ecotone topography within a diverse, highly ecologically functional landscape.*
- 2. Propose nature-based shoreline interventions and a long-term management plan that can adapt to changing hydrodynamic forcing and encourage geomorphic processes that support the emergence of desired habitat and landforms.*
- 3. Identify measures that could be feasibly implemented and managed within the City's available resources and expand project leadership and partnerships to support long-term management efforts where possible.*
- 4. Create a restoration and adaptive management plan that anticipated and accommodates rising sea levels, increased storm frequency, and other climate change-related effects.*
- 5. Prioritize interventions that are compatible with and appropriately protective of nearby critical infrastructure.*
- 6. Support local sea-level rise adaptation planning and propose measures that are in accordance with relevant regulatory and permitting considerations.*
- 7. Work with residents, indigenous organizations, and community groups to inform the restoration plan and post-restoration educational opportunities.*

Project Objectives (Simplified)

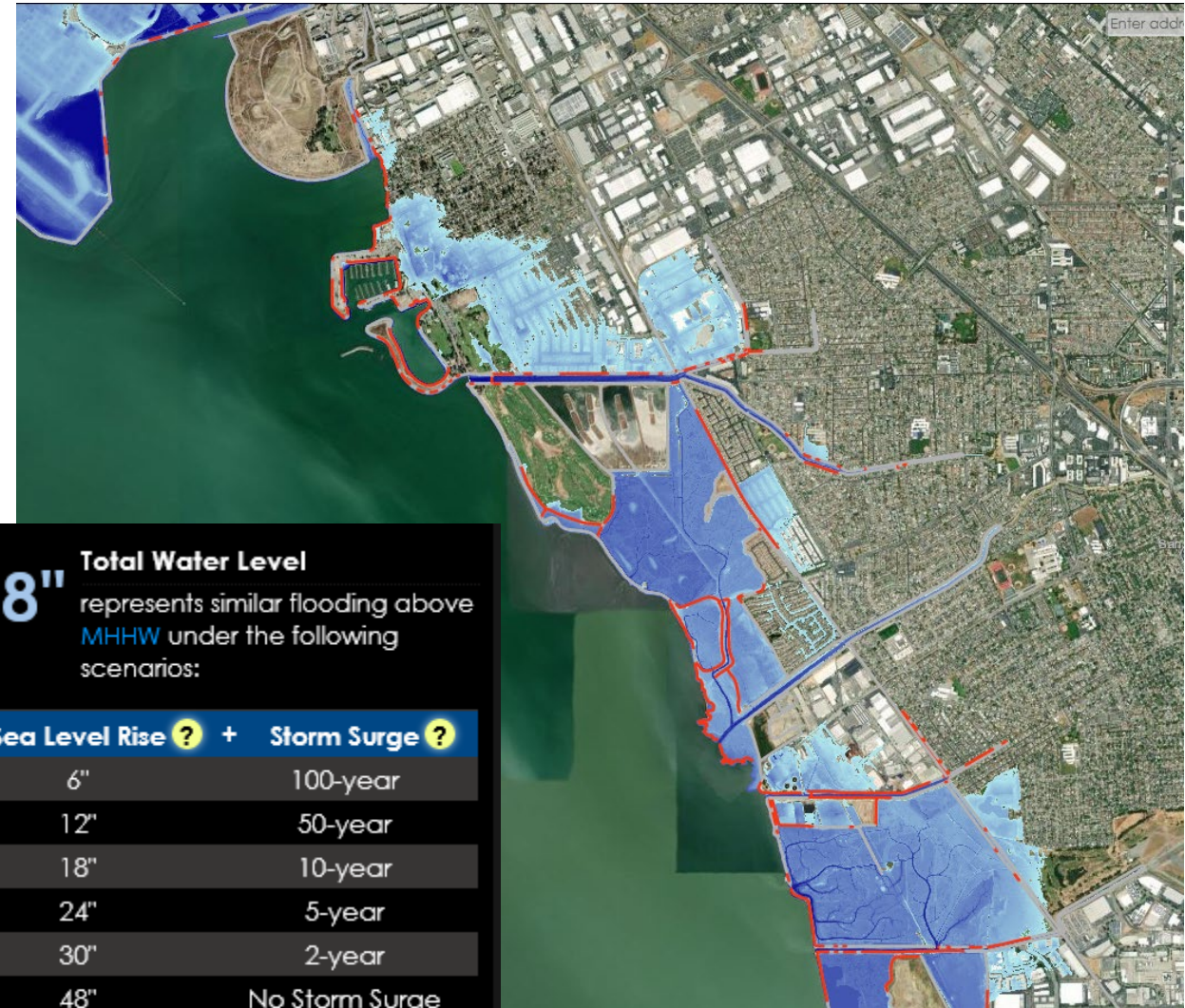
1. Restore and enhance a mix of beach, marsh and upland habitats
2. Use nature-based methods, work with natural processes, improve long-term resilience
3. Design a project that will be competitive for grant funding
4. Design for sea-level rise and climate change
5. Preserve existing critical infrastructure
 - Increased infrastructure protection is not a primary objective, but project should provide additional protection if/where feasible
6. Design a project that is consistent with regulations and regional planning guidance
7. Include the community in planning and design process

Feedback from Prior Community Meetings

- **San Lorenzo Creek:** Request for City to look for opportunities to support/enhance habitats for salmonids on San Lorenzo Creek
- **Recreational Access:** Residents value the opportunity for informal off-trail access to the beach
- **Grant Funding:** Prioritize project designs that can be funded through State or Federal grant programs, minimizing or avoiding costs to City and residents.
- **Educational Signage:** Robert's Landing, Trojan Powder Works, Historic Shore Location, etc.
- **Regional SLR Adaptation:** There is a need for a comprehensive regional SLR Adaptation Plan
 - Long Beach shoreline project could be an early example of nature-based management
 - Data from Long Beach studies can inform regional planning

Regional SLR Planning

- Long Beach Shoreline Project will reduce shoreline erosion, but other coastal hazards will remain/will increase with sea-level rise
 - Coastal Flooding
 - Impaired Stormwater Drainage
- USACE, BCDC, CA EPA all are encouraging nature-based shoreline management
 - Long Beach Shoreline Project could be an early example of nature-based management
 - Data from Long Beach studies can inform regional planning



48" Total Water Level represents similar flooding above MHHW under the following scenarios:

Sea Level Rise ?	+	Storm Surge ?
6"		100-year
12"		50-year
18"		10-year
24"		5-year
30"		2-year
48"		No Storm Surge

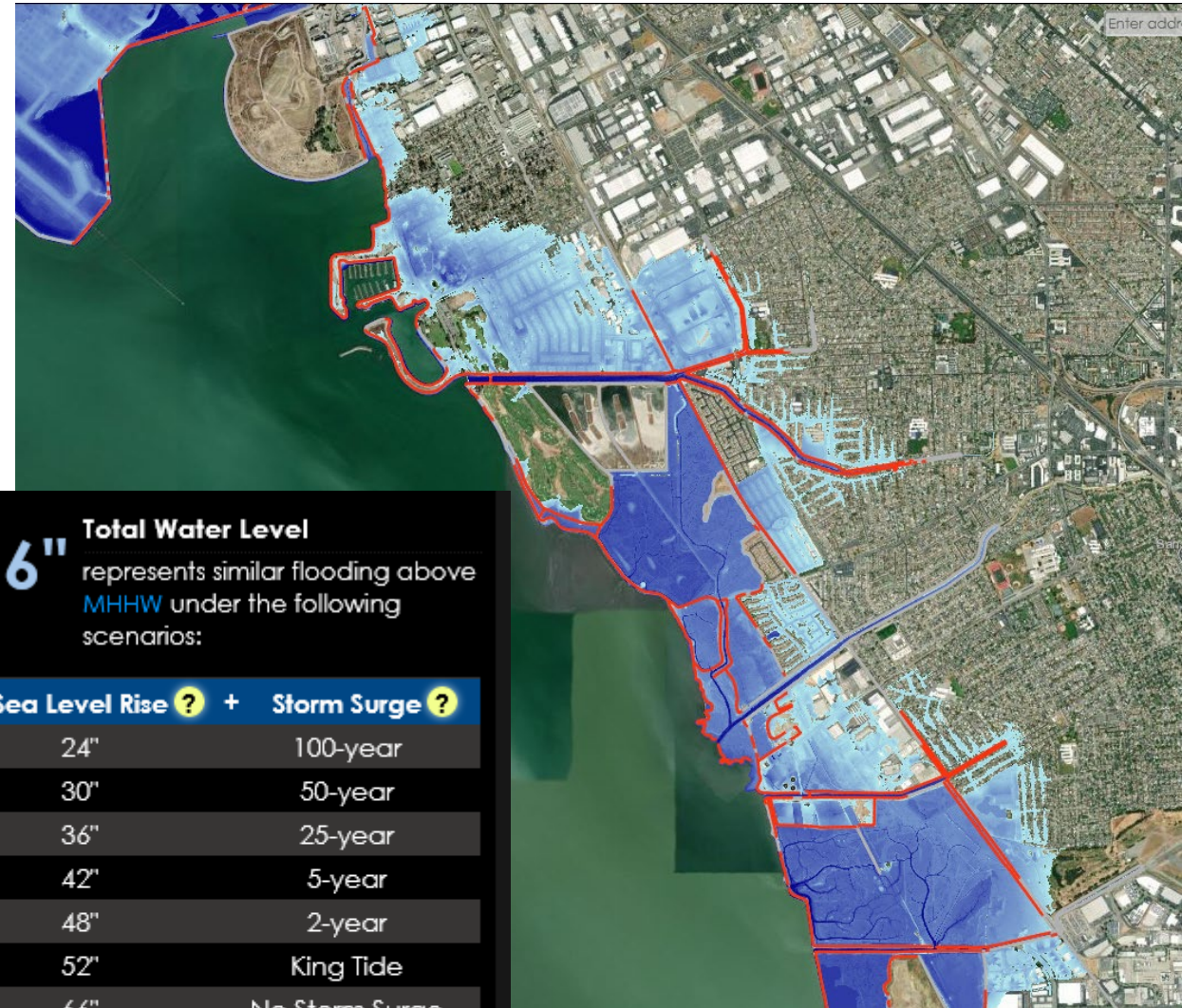
Alameda County

At the county scale, these scenarios present average water levels that are representative of what could occur along each county's shoreline. The mapped scenarios are based on binning the water levels with a tolerance of ±3 inches. For more information on regional vs. county scale planning, see the [About page](#).

Source:
explorer.adaptingtoringtides.org/explorer

Regional SLR Planning

- There is a need for a comprehensive SLR Adaptation Plan
 - Regional SLR Adaptation Plan for City of San Leandro (or County-wide Plan?)
 - Coordination with City of Hayward, East Bay Parks, Alameda County, and others
 - BCDC Guidelines are expected by end of 2024
- Federal, State and Regional grant funding available to support cities and counties:
 - USEPA, NOAA/NFWF
 - CA SB1 – Climate Resilience
 - SF Bay Restoration Authority



66" Total Water Level
represents similar flooding above MHHW under the following scenarios:

Sea Level Rise ?	+	Storm Surge ?
24"		100-year
30"		50-year
36"		25-year
42"		5-year
48"		2-year
52"		King Tide
66"		No Storm Surge

Alameda County

At the county scale, these scenarios present average water levels that are representative of what could occur along each county's shoreline. The mapped scenarios are based on binning the water levels with a tolerance of ±3 inches. For more information on regional vs. county scale planning, see the [About page](#).

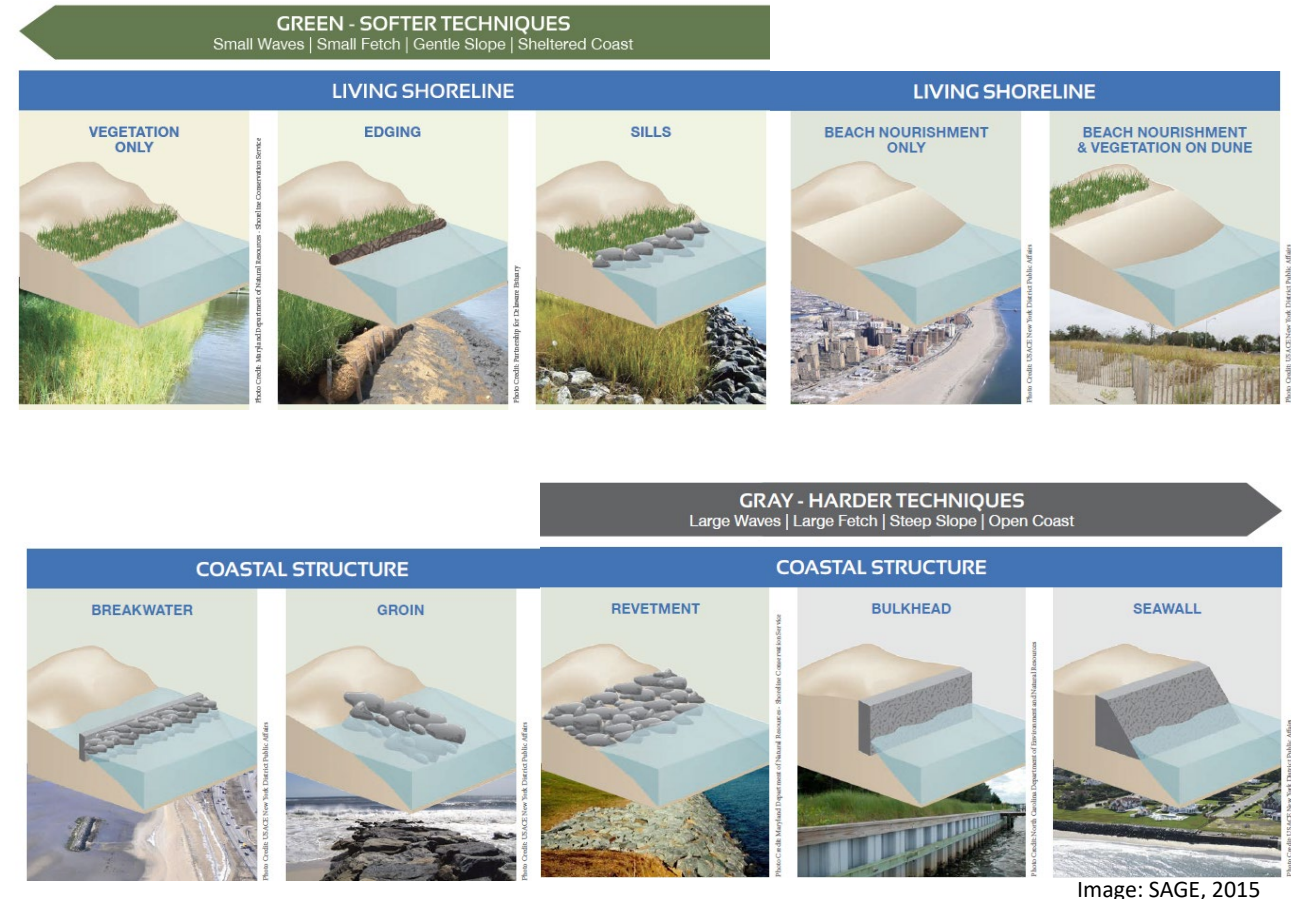


Source: explorer.adaptingtorisingtides.org/explorer

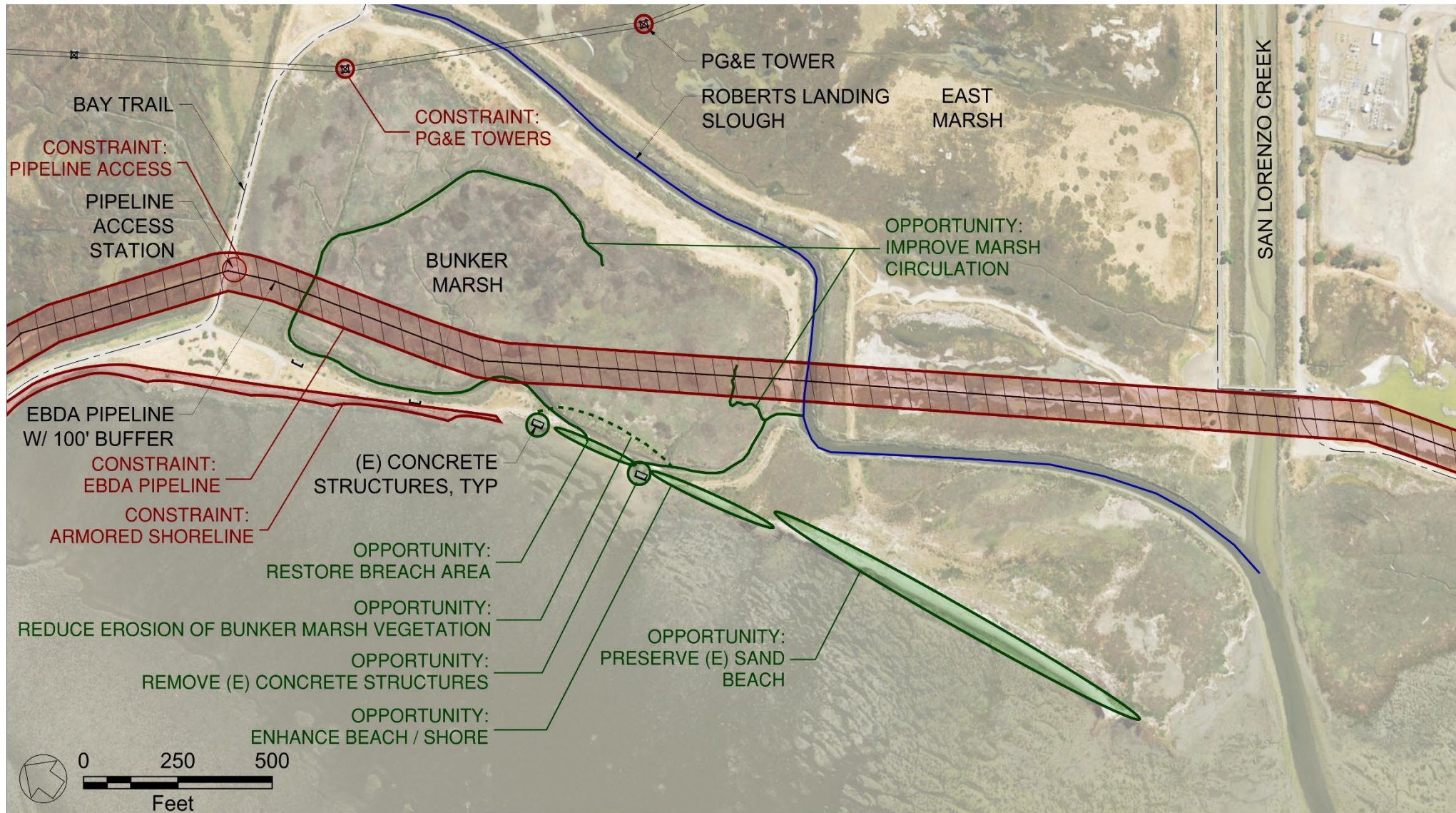
Conceptual Design Development

Workflow:

1. Opportunities and Constraints
2. Evaluation Criteria
3. “Menu” of Potential Elements
4. Initial Screening of Elements
5. Develop Alternatives (Draft)
6. Alternatives Evaluation (Draft)
7. Refine Conceptual Design of Recommended Alternative

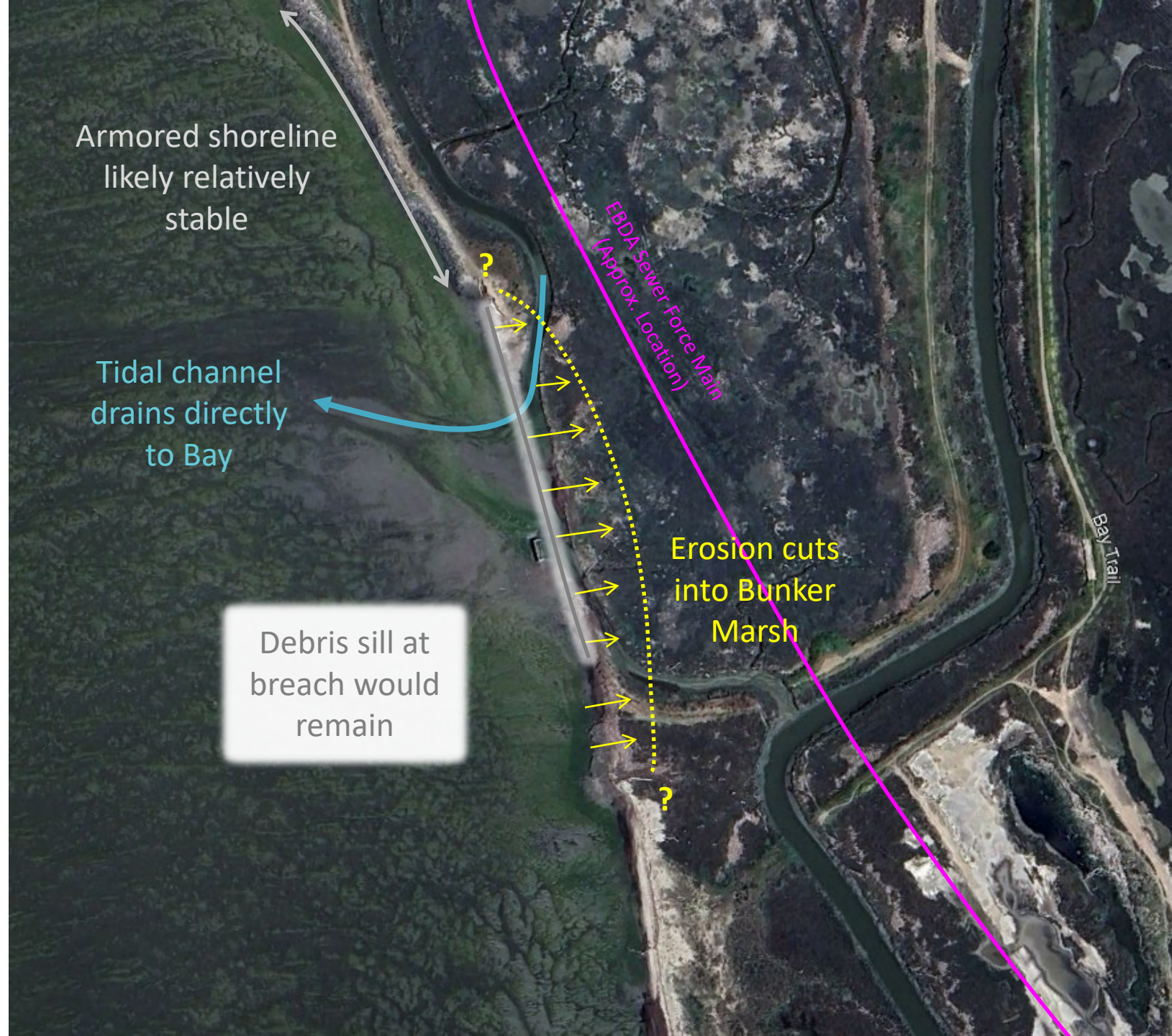


Opportunities and Constraints







No Action Outcomes

- Erosion will eat away at tidal marsh habitats at Bunker Marsh
- Very hard to predict how fast and how far the marsh will erode
- Uncertain if shoreline would eventually reach a stable alignment with no action
- Tidal circulation in Bunker Marsh will be limited by existing gravel/debris sill at breach

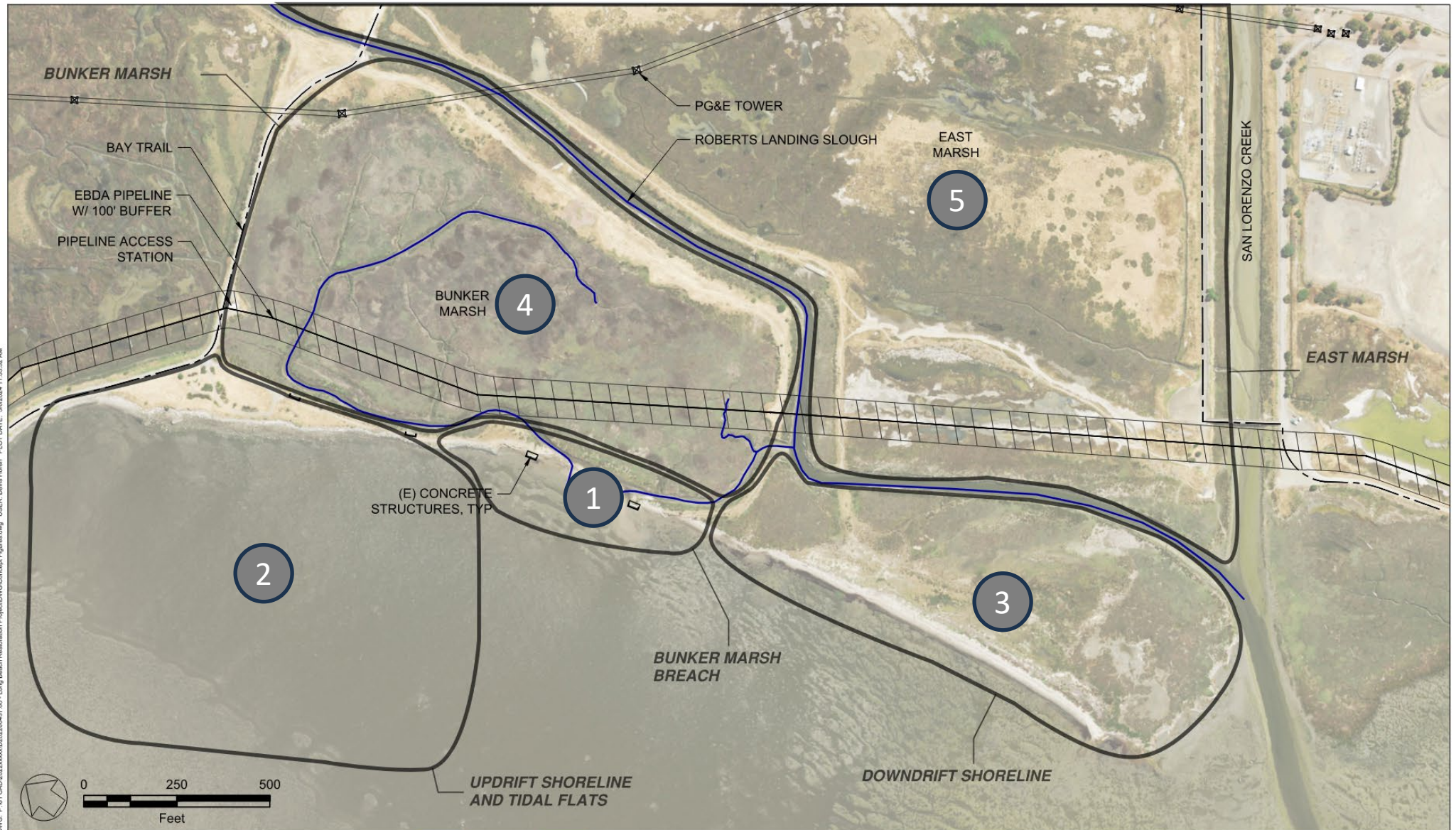


Alternatives Evaluation Criteria

TABLE 11. ALTERNATIVES EVALUATION CRITERIA

Evaluation Criteria	Description	Scoring (1 to 5)	Weighting (%)
Shoreline Resilience	Relative amount of functional protection to the marshes provided by the alternative	1 is for least amount of protection 3 is for greatest amount of protection	15% 
Adaptive Capacity	Ability to adapt alternative to future sea-level rise amounts greater than used in design	1 is for least amount of adaptive capacity 3 is for greatest amount of adaptive capacity	10%
Ecological Function	The amount of overall ecological value the alternative adds to the existing conditions	1 is for least ecological value 3 is for greatest ecological value	15% 
Construction Cost	Relative or approximate construction cost of alternative	1 is most expensive 3 is least expensive	20% 
Maintenance and Operation Cost	Approximate maintenance cost and frequency	1 is for greatest amount of maintenance 3 is for least amount of maintenance	15% 
Fill Quantity and Footprint	Net fill placed on existing marshes and in bay below MHHW	1 is for greatest amount of fill 3 is for least amount of fill	5%
Permitting Feasibility	Relative effort and cost required to obtain required permits	1 is for greatest effort required 3 is for least effort required	10%
Infrastructure Compatibility	Need for adjustment of surrounding infrastructure (PG&E, EBDA pipeline, Bay Trail)	1 is for greatest adjustments necessary 3 is for least adjustments necessary	10%

Areas for Initial Screening of Potential Project Elements



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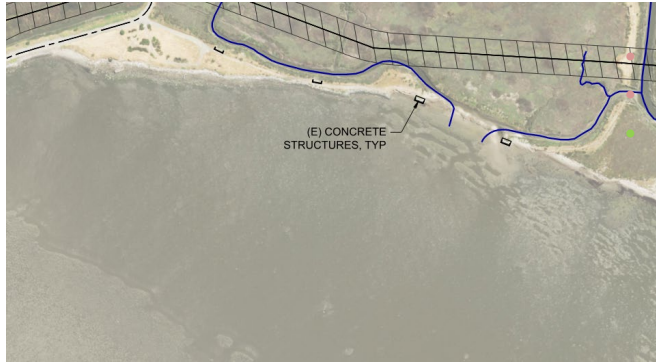
Long Beach Shoreline Restoration / D202200437.00

Figure 9

Existing Conditions and Design Measure Areas

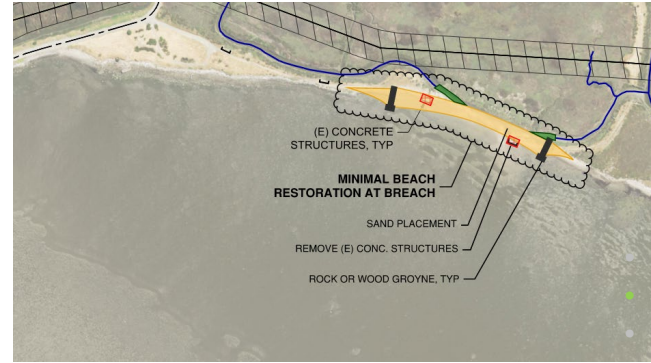
Initial Screening: Bunker Marsh Breach Area

No Action

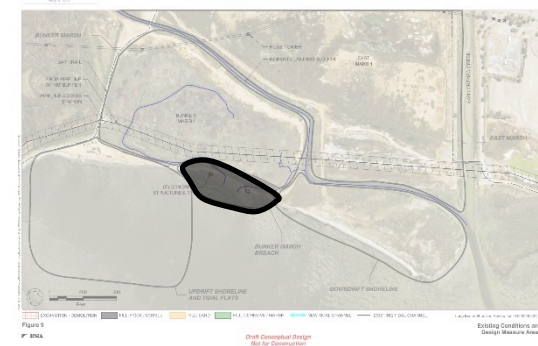


Not Recommended
 Lowest Resilience
 Poor Ecological Outcomes
 Lowest cost

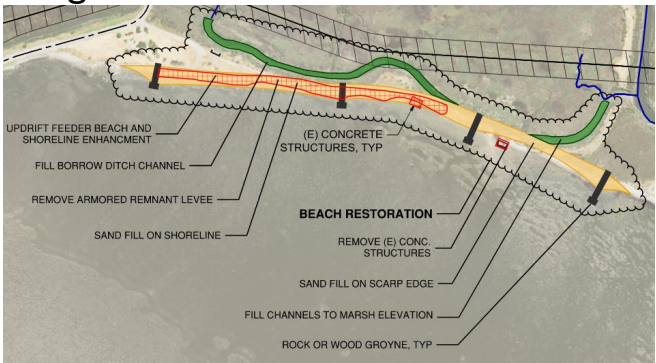
Small-Scale Breach Restoration



Potentially Acceptable
 Low/Moderate Resilience
 Moderate Ecological Benefits
 Low/Moderate cost

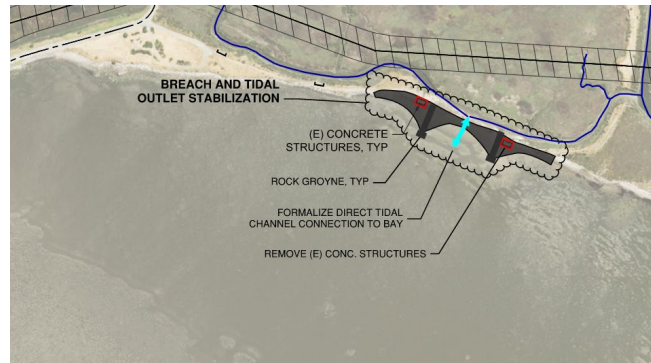


Large-Scale Breach Restoration



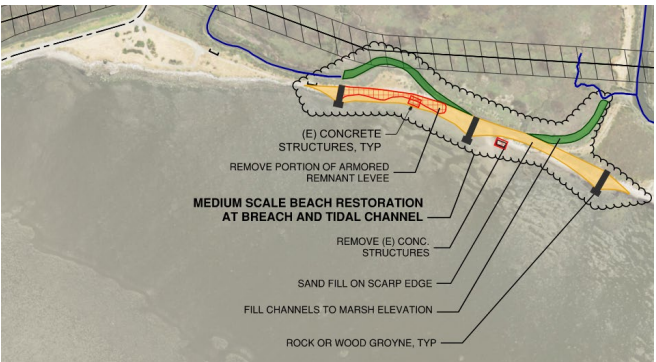
Potentially Acceptable
 High Resilience
 Highest Ecological Benefits
 Highest cost

Breach and Tidal Outlet Stabilization (Rock and/or Gravel)



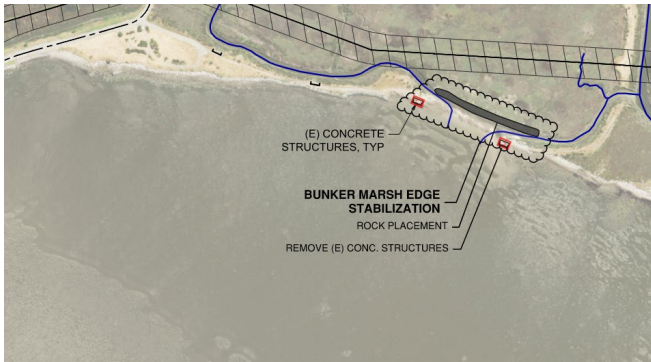
Not Recommended
 Low/Moderate Resilience
 Poor Ecological Outcomes
 Moderate cost

Medium-Scale Breach Restoration



Potentially Acceptable
 Moderate Resilience
 High Ecological Benefits
 Moderate Cost

Marsh Edge Stabilization (Rock and/or Gravel)



Not Recommended
 Low Resilience
 Poor Ecological Outcomes
 Low cost

Project Alternatives

ESA has combined measured from the initial screening to create several project alternatives reflecting different scales for the potential project

No Action

Alternative 1: Small scale breach restoration

Alternative 2: Medium scale breach restoration with updrift feeder beach

Alternative 3: Large scale breach restoration with updrift feeder beach and downdrift sand nourishment

No Action



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Long Beach Shoreline Restoration / D202200437.00

Figure 29

Alternative 0: No Action

Alternative 1



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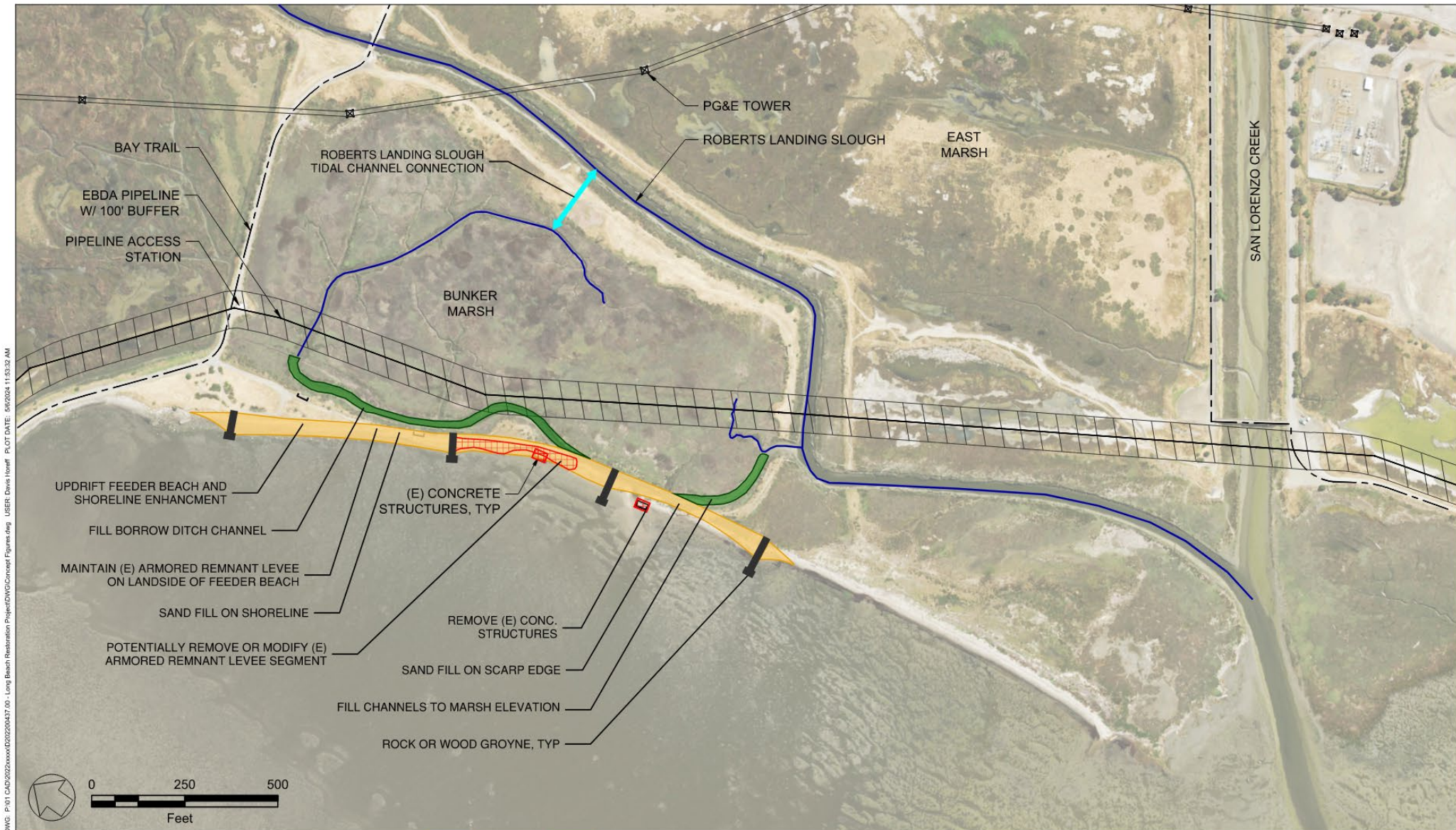


Long Beach Shoreline Restoration / D202200437.00

Figure 30

**Alternative 1: Minimal Disturbance
 Beach Restoration at Breach**

Alternative 2



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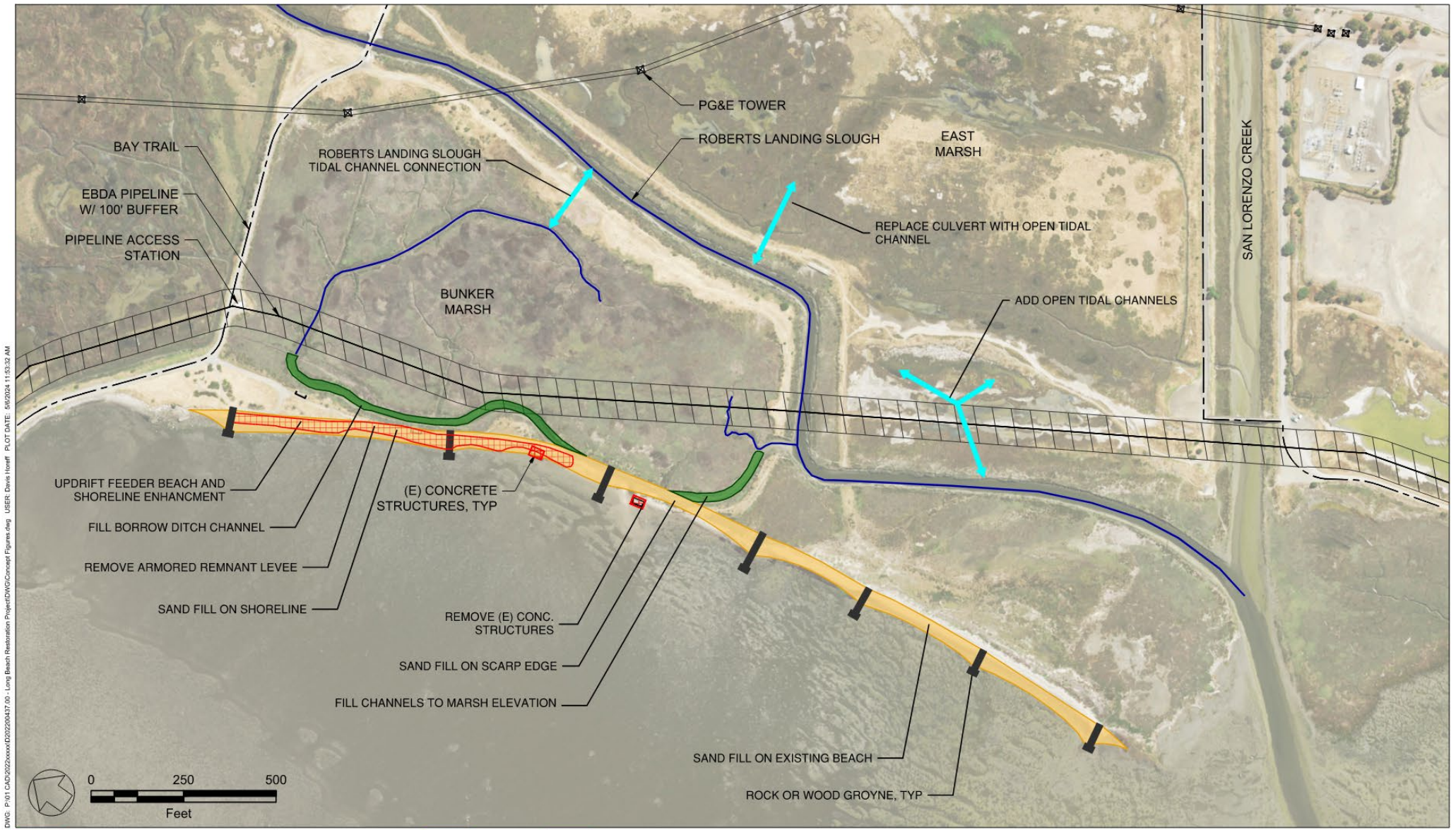
- EXCAVATION / DEMOLITION
- FILL: ROCK / COBBLE
- FILL: SAND
- FILL: COHESIVE / MARSH
- NEW TIDAL CHANNEL
- EXISTING TIDAL CHANNEL

Long Beach Shoreline Restoration / D202200437.00

Figure 31

Alternative 2: Beach Restoration at Breach with Feeder Beach

Alternative 3



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Long Beach Shoreline Restoration / D202200437.00

Figure 32

Alternative 3: Maximize Near-Term Beach Habitat

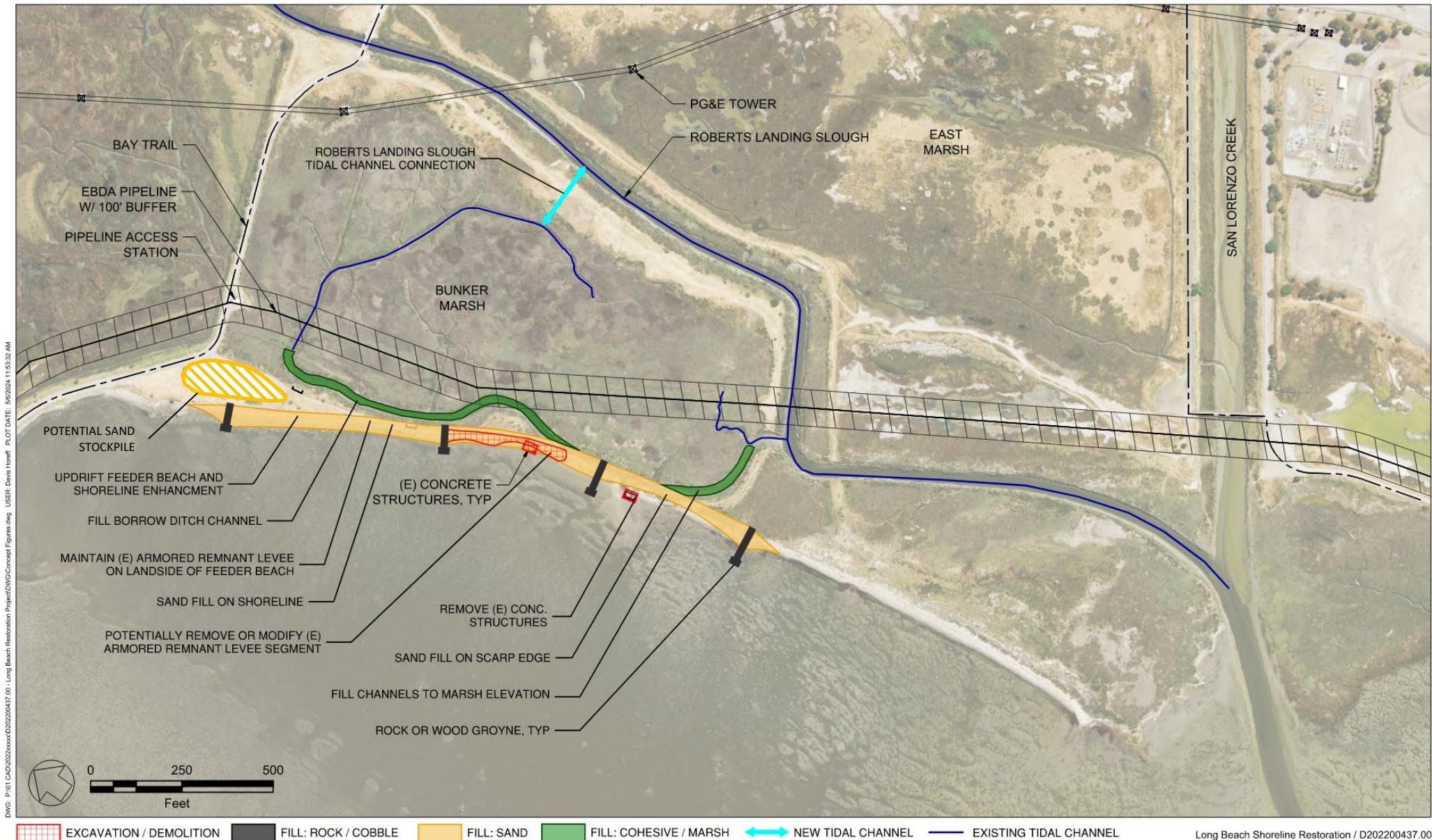
Draft Alternatives Evaluation

TABLE 12. ALTERNATIVES EVALUATION

Evaluation Criteria	Alt 0: No Action	Alt 1: Minimal Disturbance Beach Restoration	Alt 2: Beach Restoration at Breach with Feeder Beach	Alt 3: Maximize Near-Term Beach Habitat
Shoreline Resilience	0	2	3	3
Adaptive Capacity	0	2	3	3
Ecological Function	1	2	3	3
Construction Cost	3	2	2	1
Maintenance and Operation Cost	3 (2?)	1	2	2
Fill Quantity and Footprint	3	2	2	1
Permitting Feasibility	2 (3?)	2	2	1
Infrastructure Compatibility	2	3	3	3
Weighted Average	1.75	1.95	2.50	2.15

**Recommended
for Conceptual
Design**

DRAFT Recommended Concept



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Figure 31

Long Beach Shoreline Restoration / D202200437.00

Alternative 2: Beach Restoration at Breach with Feeder Beach

Considerations for Future Design

Options to deliver 10-20k CY of Sand:

- Hydraulic Placement (from Barge)
- Trucks (~1,500 truck loads)



Sand placement at Crown Beach in Alameda (EBRPD)

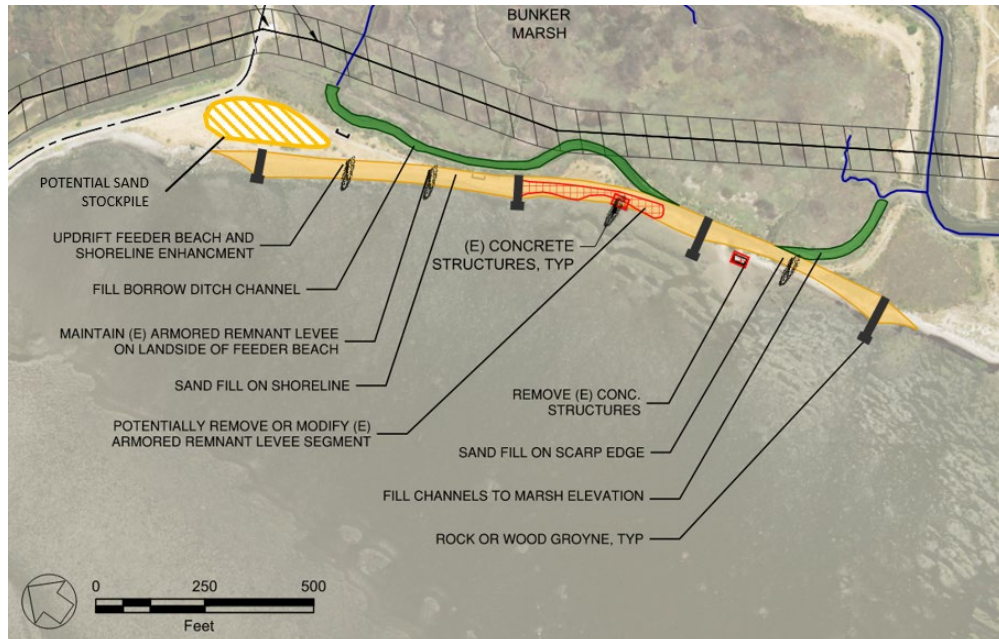


Gravel placement at Heron's Head Beach in San Francisco (Port of SF)

Considerations for Future Design

Number, size, location of “Drift Sills”

- Align with existing landforms and tie-in with existing rip-rap
- Geotechnical analysis needed
- Opportunity to re-use existing logs and large rock debris



a) North Beach, Samish Island; single drift sill at down-drift end of 850-ft-long project.



b) Boulevard Park, Bellingham; single larger groin at down-drift end of 280-ft-long beach.



c) North Beach, Orcas Island; western drift sill at end of 510-ft-long project, eastern sill at opposite end (Appendix A).



d) Weaverling Spit, Samish Indian Reservation; 1 of 4 large log drift sills within a 500-ft-long project in a highly degraded net shore-drift cell.

Considerations for Future Design

East Marsh Tidal Channels

- Potential to improve tidal circulation in portions of East Marsh
 - benefits fish & other wildlife
- Potential to replace existing degraded culverts with channels
 - Hydraulic/Flooding analysis needed
 - Bridge needed at Bay Trail
- These measures would increase project complexity and cost



Next Steps

- Finalize Draft Alternatives Analysis
 - Currently under review by City & Technical Advisory Group
- Draft and Final Conceptual Design Report
- 30% Design Drawings
- Grant Funding Strategy



Questions and Discussion



COMMENT #196

From: Frank Lorch (franklorch@yahoo.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 11:03 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
To sustainably and cost-effectively protect the Bay Area, please consider the following:

1. Prioritize ecosystem health and NNBS at every step
NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems—essential to our communities, our economy, and global biodiversity—are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

* The RSAP should prioritize Baylands health by making NNBS and habitat ecosystems core considerations for every aspect of SLR plan development. As an example, mapping of opportunities for NNBS, including habitat migration, should be included in the checklists for each Strategic Regional Priority.

2. Clarify requirements and emphasize ecosystem health standards
Inconsistent reference to requirements between and among the Vision Statements, the "required assets and actions" in Section 2, and the Standards in Section 3 may create confusion and hinder progress. Much like the equity assessment, Ecosystem health Standards should be explicitly required in each RSAP element and checklist, ensuring clarity, compliance, and successful implementation.

3. Strengthen Groundwater and Contamination Standards
SLR poses significant contamination risks from toxic sites and landfills along the shoreline. While the RSAP includes a narrow standard for reducing contamination risks due to flooding in socially vulnerable, environmental justice (EJ) communities, it fails

to address non-emergent groundwater rise and soil disruption related to adaptation projects themselves. The RSAP currently also lacks any contamination Standard for non-EJ communities.??

* Expand Contamination Standards\nBroaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

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Thank you for your consideration.

Sincerely,

Frank Lorch

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #197

From: Lawrence Abbott <lawrencerabbott@aol.com>

Sent: Tuesday, October 15, 2024 11:16 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Comments on proposed SL shoreline wall

Dear public comment folks

I don't like the proposed plan to build a wall on the San Leandro shoreline.

I do understand the proposed plan to restore Long Beach but I don't believe that it is best for the Bay, the marshland, nor for protecting the nearby neighborhoods from sea level rise. I think that nature-based, green engineering options such as a horizontal levy, and/or just bringing in sand are much better options for the bayshore and its ecosystem.

Engineers want to build a hardscape! The RSAP should provide nature based alternatives. At this site, there exists old relic alterations and contaminations which should be the concern of BCDC. The RSAP should provide some guidelines for how BCDC can clean up, restore, and mitigate the mess. It should bring a regional perspective to decisions about what happens here because of what lies behind and around this area.

The RSAP should inform how the BCDC will interact with all of the jurisdictions and agencies which are stakeholders in this particular part of the Bay. Maybe the BCDC could mediate between the City and the other agencies and groups. This would be the best way for the Bay, the shoreline and its ecosystem to remain intact.

Thank you, Lawrence Abbott

1231 Drake Ave

San Leandro, Ca 94579

510-512-3212

[Sent from the all new AOL app for iOS](#)

COMMENT #198

From: Marilyn Price (mprice@the-acorn.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Tuesday, October 15, 2024 11:30 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
To sustainably and cost-effectively protect the Bay Area, please consider the following:

1. Prioritize ecosystem health and NNBS at every step
NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems—essential to our communities, our economy, and global biodiversity—are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

* The RSAP should prioritize Baylands health by making NNBS and habitat ecosystems core considerations for every aspect of SLR plan development. As an example, mapping of opportunities for NNBS, including habitat migration, should be included in the checklists for each Strategic Regional Priority.

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Thank you for your consideration.

Sincerely,

Marilyn Price

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #199

From: Margie Halladin (margiehalladin@yahoo.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Wednesday, October 16, 2024 1:04 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Margie Halladin

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #200

From: Rob Sicotte (rob.sicotte@yahoo.com) Sent You a Personal Message

<kwautomail@phone2action.com>

Sent: Wednesday, October 16, 2024 7:07 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Thank you for your consideration.

Sincerely,

Rob Sicotte

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COMMENT #201

From: Adrian Fried (adriannovato@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Wednesday, October 16, 2024 7:27 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Thank you for your consideration.

Sincerely,

Adrian Fried

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COMMENT #202

From: Martin Horwitz (martin7ahorwitz@yahoo.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Wednesday, October 16, 2024 8:22 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

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Sincerely,

Martin Horwitz

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COMMENT #203

From: Star St John (starst.john@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Wednesday, October 16, 2024 8:40 AM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Please implement nature-based solutions for Bay Area sea level rise incorporating socially just plans.

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

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Thank you for your consideration.

Sincerely,

Star St John

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COMMENT #204

From: Gary Mononi (mononi.gary@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Wednesday, October 16, 2024 8:53 AM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

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Gary Mononi

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COMMENT #205

PDF – Marin Conservation League

October 16th, 2024



Protecting Marin Since 1934

Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105
e-mail: publiccomment@bcdc.ca.gov

Subject: "RSAP" – Draft Regional Shoreline Adaptation Plan

To whom it may concern:

Marin Conservation League (MCL) is a 90-year-old, non-profit organization that promotes and advocates for the protection of the environment in Marin County. Our work includes, among others, following, promoting, and advocating for the sensible planning of climate change adaptation. We have been tracking the laudatory effects of San Francisco Bay Conservation and Development Commission's (BCDC) regulatory and advisory authority on Marin County's shoreline regions for many decades, in particular since the 2011 Bay Plan Amendment that mandated consideration of climate change and sea level rise in all new shoreline development.

MCL would like to thank BCDC for the opportunity to review and submit comments on Draft Regional Shoreline Adaptation Plan (Draft RSAP), related Bay Plan Amendments, and supportive CEQA/environmental findings. MCL has reviewed these documents for alignment with its longstanding mission, which is, *"To preserve, protect and enhance the natural assets of Marin in a changing environment."* In addition, this review considers MCL policy positions on sea level rise (SLR), greenhouse gas (GHG) emissions, and biodiversity. With this, MCL respectfully submits the following comments, requests, and suggestions:

General Comments

1. The Draft Regional Shoreline Adaptation Plan (RSAP) presents an exhaustive and comprehensive effort to address and coordinate the planning for rising tides in the Bay region. The Draft RSAP provides the logical next step to the successful Adapting to Rising Tides Program and the Bay Adapt Joint Platform. BCDC is to be congratulated for its monumental work.
2. The Draft RSAP presents the purpose and foundation of this plan, which is to promote the One Bay Vision supported by strategic regional priorities. MCL fully supports the One Bay Vision and applauds the eight regional priorities included in this vision. Although all of the regional priorities are equally important, of particular interest to MCL is the regional priority addressing the need to protect, restore and enhance the Baylands ecosystems, and to prioritize nature-based adaptation solutions. MCL advocates for nature-based adaptation solutions, which will combat climate change and benefit the natural environment.

175 N. Redwood Dr., Ste. 135, San Rafael, CA 94903 | 415.485.6257 |
mcl@marinconservationleague.org

Marin Conservation League was founded in 1934 to preserve, protect and enhance the natural assets of Marin County.

3. The Draft RSAP and supportive staff report clearly summarize the roots of this effort in the mandate for local governments to comply with Senate Bill 272, by addressing SLR through the development and adoption of sub-regional shoreline resilience plans. The step-by-step “playbook” that is provided in the Draft RSAP Subregional Shoreline Plan Adaptation Guidelines (Guidelines) will promote consistency for such plans throughout the region. The guidelines will be extremely helpful to the local governments and will promote collective, consistently designed adaptation projects within and among the Bay area subregions. MCL wholeheartedly supports the guidelines.
4. In reviewing the supportive staff report, it is clear that the RSAP must be consistent with the adopted Bay Plan, and more importantly the McAteer-Petris Act. Amendments to the Bay Plan Climate Change Policies 1, 6, and 7 are necessary to incorporate the RSAP and to confirm this consistency. MCL was pleased to see that this finding has been adequately covered and documented. Contingent upon the amendments to the Climate Change policies referenced above, the findings presented in the staff report conclude that the RSAP aligns with the goals of the McAteer-Petris Act, in that the standards provided in the RSAP Guidelines direct local governments to continue to: a) minimize fill in the bay; and b) prioritize water-dependent uses along the shoreline. It is also clear from the RSAP that there are no changes to the longstanding geographic areas covered by the Bay Plan (extending 100 feet inland from the shore).

The one issue that is unclear in reading the RSAP and Guidelines are the implications of applying “retreat” as a suitable SLR adaptation measure. For retreat solutions that involve extending the shoreline inland from its current location, will the boundaries of the Bay Plan change to reflect the location of the new shoreline? Please confirm.

Comments on Draft RSAP

5. Chapter 2 (One Bay Vision), Section 2.3.7, Shoreline Contamination. The map on page 72 shows contaminated sites or those where contamination could potentially be mobilized. This does not show the Redwood Landfill located in northern Marin County. Was this landfill not included as it is in a location that is not vulnerable to projected SLR? The Redwood Landfill is within the watershed of and close to Petaluma River, which is a major, navigable waterway.
6. Chapter 3 (Guidelines), Element A (Planning Process). The Plan Development, Submission, and Approval Process outlines who is responsible for developing a Subregional Shoreline Adaptation Plan and encourages partnering of cities and counties to develop multi-jurisdiction plans. What provisions (such as early and substantial grants) could there be to incentivize subregional cooperative planning programs?

175 N. Redwood Dr., Ste. 135, San Rafael, CA 94903 | 415.485.6257 |
mcl@marinconservationleague.org

Marin Conservation League was founded in 1934 to preserve, protect and enhance the natural assets of Marin County.

7. Chapter 3 (Guidelines), Element C (Vulnerability Assessment). The Guidelines appropriately recommend that subregional plans include the preparation of a vulnerability assessment. On page 100, it is advised that the vulnerability assessment “map and describe areas of ...exposure to the 0.8 ft scenario (2050).” Standards C1 and C4b only require a summary of “the exposure of all assets in the Minimum Categories and Assets to the required 0.8 ft (2050), 3.1 ft (2100 Intermediate), 4.9 ft (2100 Intermediate- High), and 6.6 ft (2100 High) sea level rise scenarios as identified in the Coastal Flood Hazards and Sea Level Rise Scenarios, at a minimum.” Some mapping of the higher sea level scenarios would provide an important context for the 2050 scenario, and subsequent analysis steps.

Please note that page 108 contains a typo (“contribute to flood risk reduction at the required 0.8 ft (205)”),

8. Chapter 3 (Guidelines), Element D (Adaptation Pathways and Strategies). On page 109, the Guidelines state, “Evaluate adaptation alternatives to identify preferred adaptation strategies for shoreline reach(es).” Some explicit mention of feasibility and cost should be included in the evaluation criteria.

On page 120, Standard F2a addresses Adaptation Cost and sources, which states “...Identify potential funding and financing mechanisms (e.g., grants, bonds, etc.) that could be used.” Rather than having more than 100 local jurisdictions independently duplicating this task, it would make sense to have BCDC play a clearinghouse role feeding this information into the process, as well as leading local agencies and supporters in advocacy and grant-seeking at the state and federal level.

9. Chapter 3 (Guidelines), Element F (Project Implementation Plan and Funding Strategy). This element of the Guidelines addresses the SB 272 mandate that subregional plans must include the identification of lead planning and implementation agencies, and an economic impact analysis of, at a minimum, costs to critical public infrastructure. This issue is also addressed in Section 2.3.4-Critical Infrastructure and Service of the Guidelines, and under “affected parties” noted on page 83. However, there appears to be little proposed guidance to assure that critical, private infrastructure like gas and electricity and telecommunications facilities cooperate in planning. Private regional utilities such as PG&E and telecom companies often find it difficult to address the varying needs of local governments. Similarly, large bureaucracies such as Caltrans have ongoing plans and procedures that do not always mesh with local planning processes. BCDC could foster a framework for such to better integrate the connection between these agencies and local jurisdictions in the RSAP process.
10. Chapter 3 (Guidelines), Element G (Project List), page 124. While it may be implicit in the phrase “evaluate the urgency and benefits of projects throughout the region,” it should be made clearer that BCDC (or some other regional body) will undertake evaluating and sharing (among the Bay area communities) information about projects (including those

175 N. Redwood Dr., Ste. 135, San Rafael, CA 94903 | 415.485.6257 |
mcl@marinconservationleague.org

already completed or underway) in terms of their design, cost and effectiveness. This way, the subregions can be current and consistent in developing best practices.

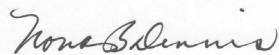
11. Chapter 3 (Guidelines), Section 3.2.1 (Minimum Standards), page 130. The “Wave runoff” box states, “FEMA flood zones V and VE are areas at increased risk of flooding from storm surge due to the velocity of coastal waves. BCDC could provide these data layers to support the plan requirements under Element B.” The “Statewide Averages and Regionally Available” chart lists ART single values for storm surge for each sea level scenario. Is it appropriate that this table also list the FEMA values?
12. Chapter 3 (Guidelines), Section 3.4.1 (Local Government Planning Responsibilities), page 168. Under “Submitting Plans and Getting Approval,” there is very little about Subregional Plan compliance with the California Environmental Quality Act (CEQA). While it is clear in the staff report that each Subregional Plan and individual adaptation projects will be subject to CEQA review and clearance, some level of guidance and explicit advice on future Subregional Plan compliance with CEQA would be helpful to the local governments.

Comments on Findings for Environmental Review/Clearance

13. Section IV of the supportive staff report addresses CEQA review and clearance for the Draft RSAP and Guidelines. This section references that the BCDC regulations require that the report include an environmental assessment (with specified contents). This discussion is followed by a statement that CEQA only applies to projects that may cause a direct or physical change in the environment. It is found that the Draft RSAP itself is a planning document and would not cause a reasonably foreseeable indirect physical change in the environment. It is also stated that per SB 272, each Subregional Plan and individual adaptation project will be subject to more, in-depth CEQA review. However, it is unclear what BCDC is recommending for CEQA clearance on the Draft RSAP. The report and supportive documents do not include an environmental assessment. What CEQA provisions are being used and recommended to take action on the Draft RSAP? For example, is the CEQA finding relying on the “general rule” provision, or a categorical or statutory exemption? Please clarify and confirm.

Thank you again for the opportunity to review and comment on the Draft RSAP. MCL looks forward to continued involvement in this important step to facilitating a regional, consistent approach to planning for SLR.

Sincerely,



Nona Dennis
President

pp Martha Richter Smith for Jack Liebster Paul A. Jensen

Jack Liebster and Paul Jensen
MCL Land Use, Transportation and Water Committee

175 N. Redwood Dr., Ste. 135, San Rafael, CA 94903 | 415.485.6257 |
mcl@marinconservationleague.org

Marin Conservation League was founded in 1934 to preserve, protect and enhance the natural assets of Marin County.

Comment #206

PDF - Naomi Goodman, Sequoia Audubon Society

October 16, 2024

Bay Conservation and Development Commission
Via email to: publiccomment@bcdc.ca.gov

Subject: Comments on Draft Regional Shoreline Adaptation Plan

Dear Planning Commissioners,

I am commenting as a volunteer with the Sequoia Audubon Society, a San Mateo County nonprofit organization that supports recreational birding and preservation of bird habitat.

San Francisco Bay is a critical habitat for resident and migratory birds. As part of the Pacific Flyway, the Bay marshes and mudflats host hundreds of thousands of migratory birds during the spring and fall and provide nesting and foraging habitat along the shoreline for resident species all year round. Sea level rise threatens to destroy those habitats unless the mudflats and marshes are allowed to move inland or sufficient sediment is deposited by streams and rivers. Groundwater rise, which may impact communities as far as half a mile inland in some areas, has the potential to dissolve and mobilize buried contaminants, resulting in discharge of harmful chemicals to the Bay.

Bird life has value not only in respect to enjoyment by humans, but is an integral part of the ecological web keeping the Bay healthy. As an organization that is tasked with balancing development with conservation, it is essential for BCDC to support measures that preserve the Bay as a functioning ecosystem.

I appreciate that the Draft RSAP provides guidance to use nature-based solutions, “whenever feasible”. However, to avoid harming the Bay ecosystems, measures to preserve Bay health need to be incorporated into all sections of the Plan, from initial scoping and funding to implementation. The following additions to the Plan are requested:

- Require nature-based solutions to be adopted to the “greatest extent feasible” before selecting a seawall or other hardscape solution.
- Encourage solutions that can be adapted over time as sea level rises, rather than overbuilding to meet long-range conditions.
- Set ambitious goals for number of acres dedicated to marshes and mudflats, and identify areas that can be set aside over time to compensate for habitat lost to sea level rise. Meeting these goals will likely require expansion of BCDC’s regulatory authority, given the rapid development along the Bayshore that is encroaching on lands better dedicated to future marshes and wetlands.
- Expand the requirement to evaluate contamination mobilization to all shoreline plans, not just those in Environmental Justice communities.

Sincerely,



Naomi Goodman
Menlo Park, CA
nl2goodman@gmail.com

COMMENT #207

PDF – Town of Corte Madera

October 16, 2024



THE TOWN OF
CORTE MADERA
MARIN COUNTY CALIFORNIA

300 Tamalpais Drive
Corte Madera, CA
94925-1492

www.cortemadera.gov

Town Manager
Town Council
415-927-5050

Town Clerk
415-927-5086

Finance Department
415-927-5055

Central Marin Fire Department
415-927-5077

Planning Division
415-927-5064

Building Division
415-927-5062

Public Works Department
415-927-5057

Parks and Recreation
Department
415-927-5072

Sanitary District No. 2
628-253-1158

Central Marin Police Authority
415-927-5150

San Francisco Bay Conservation and Development Commission
R. Zachary Wasserman, Chair, Commissioners, and Alternates
375 Beale Street, Suite 510
San Francisco, CA 94105

Subject: Public Comment on Bay Plan Amendment No. 1-24 to Adopt a Regional Shoreline Adaptation Plan and Establish Guidelines for the Preparation of Sea Level Rise Plans Pursuant to Senate Bill 272 (Laird, 2023)

Dear Chair Wasserman, Commissioners, and Alternates,

The Town of Corte Madera appreciates the opportunity to provide public comment for the Bay Plan Amendment No. 1-24 to Adopt a Regional Shoreline Adaptation Plan and Establish Guidelines for the Preparation of Sea Level Rise Plans Pursuant to Senate Bill 272 (Laird, 2023). The Town has already completed comprehensive sea level rise planning through its [Climate Adaptation Assessment](#), [Multi-Jurisdictional Local Hazard Mitigation Plan](#), and, most recently, [Shoreline Adaptation Engagement Effort](#). As a result of the extensive community engagement and planning completed over the past five years, the Town has identified key next steps to protect the community and is ready to move these priority protection measures into implementation.

After reviewing the Draft Regional Shoreline Adaptation Plan, Staff Report and Preliminary Recommendation, we hope that BCDC will consider the following points from the perspective of a local government that has already completed thorough planning to address sea level rise.

- We request that all previous work to plan for sea level rise, including but not limited to vulnerability assessments, climate adaptation plans or assessments, hazard mitigation plans, etc., be counted towards the requirements. The current draft guidelines state that previous work may be used, but do not provide clear guidance regarding how existing plans will be evaluated. We request that BCDC provide clear guidance and technical assistance regarding use of existing plans.
- We request that BCDC create a draft, all-inclusive Scope of Work with a rough cost associated for local governments to use to understand the true magnitude of staff time and funding needed. Local governments that have already adopted plans or have plans underway could use a Scope of Work to amend their current plans to fulfill guideline requirements.
- The draft guidelines state that local governments must work with regional transit and utility agencies, however, we have concerns about agency capacity to coordinate with all jurisdictions under the 2034 deadline.

- We have concerns regarding funding for all jurisdictions to develop these plans. The Town of Corte Madera has already spent over \$540,000 on climate adaptation planning, including over \$340,000 in local funds and \$200,000 in grant funds, plus significant staff time. We would need additional funding to meet the requirements outlined in the draft guidelines, and request that a clear path for funding be identified.
- We have concerns about the staff time required to fulfill these new planning requirements, while also moving forward urgent implementation projects to protect our community that have already been identified through previous planning efforts.

If you have any questions or would like to discuss the points outlined in this letter, please contact the Town's Climate Action and Adaptation Coordinator, Phoebe Goulden at pgoulden@cortemadera.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Adam Wolff', with a stylized flourish at the end.

Adam Wolff, Town Manager

CC: Corte Madera Town Council

COMMENT #208

From: Shirley Lutzky (shirlutzky@hotmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>

Sent: Wednesday, October 16, 2024 1:07 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

As a grandmother I am very concerned about the state of nature and the resulting problems for my little grandchildren and their peers, locally and all over the world. Earth should be kept as natural as possible. Humans mess things up more and more and call it progress, then deny what they have caused; let's become wiser. Please heed the full message here. Thank you.

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
To sustainably and cost-effectively protect the Bay Area, please consider the following:

1. Prioritize ecosystem health and NNBS at every step
NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems?essential to our communities, our economy, and global biodiversity?are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

* The RSAP should prioritize Baylands health by making NNBS and habitat ecosystems core considerations for every aspect of SLR plan development. As an example, mapping of opportunities for NNBS, including habitat migration, should be included in the checklists for each Strategic Regional Priority.

2. Clarify requirements and emphasize ecosystem health standards
Inconsistent reference to requirements between and among the Vision Statements, the ?required assets and actions? in Section 2, and the Standards in Section 3 may create confusion and hinder progress. Much like the equity assessment, Ecosystem health Standards should be explicitly required in each RSAP element and checklist, ensuring clarity, compliance, and successful implementation.

3. Strengthen Groundwater and Contamination Standards
SLR poses significant contamination risks from toxic sites and landfills along the shoreline. While the RSAP includes a narrow standard for reducing contamination risks due to flooding in socially vulnerable, environmental justice (EJ) communities, it fails to address non-emergent groundwater rise and soil disruption related to adaptation projects themselves. The RSAP currently also lacks any contamination Standard for non-EJ communities.??

* Expand Contamination Standards
Broaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

4. Define Metrics for Habitat Goals

The RSAP includes a Standard that requires protection, restoration, and/or enhancement of Baylands habitats to "meet habitat goals," but these goals are neither defined or quantified.?

* The RSAP should establish clear, measurable habitat goals and require each local plan to specify how it will contribute to them, and BCDC should monitor and report on progress toward these targets to ensure accountability and success.

This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

Shirley Lutzky

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #209

From: Riah Wemple (rockfeko33@gmail.com) Sent You a Personal Message
<kwautomail@phone2action.com>
Sent: Wednesday, October 16, 2024 3:22 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
To sustainably and cost-effectively protect the Bay Area, please consider the following:

1. Prioritize ecosystem health and NNBS at every step
NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems?essential to our communities, our economy, and global biodiversity?are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

* The RSAP should prioritize Baylands health by making NNBS and habitat ecosystems core considerations for every aspect of SLR plan development. As an example, mapping of opportunities for NNBS, including habitat migration, should be included in the checklists for each Strategic Regional Priority.

2. Clarify requirements and emphasize ecosystem health standards
Inconsistent reference to requirements between and among the Vision Statements, the ?required assets and actions? in Section 2, and the Standards in Section 3 may create confusion and hinder progress. Much like the equity assessment, Ecosystem health Standards should be explicitly required in each RSAP element and checklist, ensuring clarity, compliance, and successful implementation.

3. Strengthen Groundwater and Contamination Standards
SLR poses significant contamination risks from toxic sites and landfills along the shoreline. While the RSAP includes a narrow standard for reducing

contamination risks due to flooding in socially vulnerable, environmental justice (EJ) communities, it fails to address non-emergent groundwater rise and soil disruption related to adaptation projects themselves. The RSAP currently also lacks any contamination Standard for non-EJ communities.??

* Expand Contamination Standards\nBroaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

4. Define Metrics for Habitat Goals

The RSAP includes a Standard that requires protection, restoration, and/or enhancement of Baylands habitats to "meet habitat goals," but these goals are neither defined or quantified.?

* The RSAP should establish clear, measurable habitat goals and require each local plan to specify how it will contribute to them, and BCDC should monitor and report on progress toward these targets to ensure accountability and success.

This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

Riah Wemple

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #210

From: Akanksha Chopra <AChopra@cityofsancarlos.org>
Sent: Wednesday, October 16, 2024 3:17 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: RSAP

Hello,

Please see below comments from City of San Carlos on draft RSAP.

1. Regarding Element G (Project List), the project list needs to include projects that are to be initiated or completed in the next 10 years. Please clarify at what point the 10 years should commence from for the identified projects (submittal of the subregional shoreline adaptation plan, approximate approval of the plan, or the legislative deadline).
2. Regarding Element G (Project List), should jurisdictions include projects on sites owned by private landowners, where the timeline, funding, etc. are outside of the jurisdiction's control?
3. If a multijurisdictional subregional shoreline adaptation plan is submitted, are all jurisdictions approved at the same time? Or can certain jurisdictions be approved if parts of the plan that address their jurisdictional area are approvable?
4. Please clarify at what point the jurisdiction needs to complete environmental review of their subregional shoreline adaptation plan.

Thank you,

Akanksha

Akanksha Chopra, AICP, MCIP (she/her)

Associate Planner

Community Development Department | City of San Carlos
achopra@cityofsancarlos.org | (650) 802-4350

COMMENT #211

From: Rupp, Meredith <Meredith.Rupp@cityofconcord.org>
Sent: Wednesday, October 16, 2024 3:30 PM
To: BCDC PublicComment <publiccomment@bcdcc.ca.gov>
Cc: Gentry, Mindy <Mindy.Gentry@cityofconcord.org>
Subject: RSAP

Hello,

Thank you for the opportunity to comment on the Bay Plan Climate Change Policy amendment and draft Regional Shoreline Adaptation Plan.

The City of Concord has reviewed the materials and has the following comment:
Does BCDC have a contact at Contra Costa County for the person/department who will be preparing the subregional shoreline adaptation plan for Contra Costa County? The City of Concord would like to be involved as a planning partner. We appreciate BCDC's assistance in documenting and conveying our interest to the right people at the County as appropriate.

Thank you,

Meredith Rupp

Principal Planner

City of Concord | Community Development Department

Website: www.cityofconcord.org

☎ (925) 603-5890 | ✉ meredith.rupp@cityofconcord.org

1950 Parkside Drive, MS 53, Concord, CA 94519



Community Development

www.cityofconcord.org | www.concordfirst.com

Your feedback on Community Development Department services would be appreciated.

Please take a moment to complete our on-line surveys at <https://www.surveymonkey.com/s/DRS1>

COMMENT #212

PDF – City of Sausalito



October 16, 2024

San Francisco Bay Conservation and Development Commission
Metro Center
375 Beale Street, Board Room
San Francisco, CA

Subject: Public Comment on Bay Plan Amendment No. 1-24 to Adopt a Regional Shoreline Adaptation Plan and Establish Guidelines for the Preparation of Sea Level Rise Plans Pursuant to Senate Bill 272 (Laird, 2023)

Dear Bay Conservation and Development Commission,

The City of Sausalito is submitting public comment for the Bay Plan Amendment No. 1-24 to Adopt a Regional Shoreline Adaptation Plan and Establish Guidelines for the Preparation of Sea Level Rise Plans Pursuant to Senate Bill 272 (Laird, 2023). The City of Sausalito's Resiliency & Sustainability Manager has been tracking SB 272 since adoption in 2023 to align with our ongoing [Shoreline Adaptation Plan](#) which is set to complete at the end of 2025. We hope that the City's Shoreline Adaptation Plan will meet as many requirements for BCDC's Regional Shoreline Adaptation Plan guidelines for local governments as possible as this effort has been incurred at great time and expense to the City. We anticipate that our Shoreline Adaptation Plan will not meet all requirements outlined in the draft guidelines, particularly Element E: Land Use and Policy Plan, which all elements are outside our current scope of work.

After reviewing the Draft Regional Shoreline Adaptation Plan, Staff Report and Preliminary Recommendation, we hope that BCDC will consider the following points from the perspective of a local government that is in the process of completing a plan to address sea level rise.

- We request that all previous work for sea level rise, including but not limited to vulnerability assessments, climate adaptation plans, hazard mitigation plans, etc., be recognized towards the requirements. The current draft guidelines state that previous work may be used, but does not provide clear guidance on how existing plans will be evaluated and place the burden on jurisdictions to ensure compliance. Direct guidance and technical assistance by BCDC to individual jurisdictions regarding which elements of the guidelines are not met by existing plans would help alleviate this burden.
- The draft guidelines state that local governments must work with other regional transit and utility agencies, however, we have concerns about agency capacity to coordinate with all jurisdictions under the 2034 deadline.
- We request BCDC to create a draft, all-inclusive Scope of Work with a rough monetary value associated for local governments to use to understand the true

magnitude of staff time, and funding needed. Local governments that have already adopted plans or plans underway could use a Scope of Work to amend their current plans to fulfil guideline requirements.

- We have concerns about funding for all jurisdictions to make these plans. The City of Sausalito was lucky enough to receive a grant from CalOES for our current Shoreline Adaptation Plan, but we realize that not all jurisdictions have this opportunity. Our current plan is scope for \$500,000 and we will likely need further funding to fulfil the requirements outlined in the draft guidelines. Similar previous efforts, like SB 867, were vetoed by the Governor based on not having available funding to support the implementation of the requirements in the bill.
- We have concerns about staff time required to fulfill these new planning requirements, while also moving forward urgent implementation projects to protect our community that have already been identified through previous planning efforts.

If you have any questions or would like to discuss points outlined in this letter, please contact the City's Resiliency & Sustainability Manager, Catie Thow Garcia at cthowgarcia@sausalito.gov.

Sincerely,



Chris Zapata,
City Manager

CC: Ian Patrick Sobieski, Mayor
Joan Cox, Vice Mayor
Janelle Kellman, Councilmember
Jill Hoffman, Councilmember
Melissa Blaustein, Councilmember
Brandon Phipps, Community and Economic Development Director
Catie Thow Garcia, Resiliency & Sustainability Manager

COMMENT #213

October 16, 2024

Zachary Wasserman
Commission Chair
San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105

Re: Regional Shoreline Adaptation Plan Comments

Dear Chair Wasserman and Commissioners,

We are writing to express our concerns and suggested amendments to the draft [Regional Shoreline Adaptation Plan](#) (RSAP). This plan will greatly influence how Bay Area jurisdictions adapt their shorelines to prepare for rising sea levels. It is therefore crucial that we get it right.

This past July, ABAG and the Metropolitan Transportation Commission, in partnership with the BCDC, released the [Sea Level Rise Adaptation Funding and Investment Framework Report](#). This report estimates regional sea level rise adaptation will cost approximately \$110 billion and that only about 4.5% of that amount, \$5 billion, is available. There is no realistic path to achieving our resilience goals without the private sector, or without aligning adaptation with the region's urgent housing, transportation, and economic development goals.

The RSAP recognizes the need to align these goals, particularly in the **Introduction** and **One Bay Vision** sections. However, in numerous instances the **Adaptation Strategy Standards** conflict with the goals and objectives and would, if adopted as written, make it much more difficult, if not outright impossible, to attract the private investment essential for defending the region against sea level rise. We urge the Commission to revise the standards to better align with the multifaceted needs of our region.

Key Concerns:

- 1. Overemphasis on Retreat and Relocation.** The current standards appear to prioritize retreat as the primary strategy for shoreline adaptation, phasing out homes, businesses, and communities based on the "useful life" of existing structures. This approach suggests that protecting these areas through strategic development is not considered a legitimate option, which could stifle opportunities for adaptation. Instead, it is critical that the RSAP embraces a more flexible, site-specific approach. For many communities, increasing development capacity could attract private investment, bringing sea level rise adaptation improvements while delivering badly needed housing, jobs, and/or transportation infrastructure.
- 2. Lack of Flexibility for Local Jurisdictions.** The "one-size-fits-all" nature of the standards limits the ability of local jurisdictions to tailor their adaptation strategies to the specific needs of their communities. It is essential that the standards allow for a broader

range of adaptation strategies, including protection and accommodation alongside retreat. This flexibility will ensure that the RSAP is realistic and achievable while promoting resilience without sacrificing economic vitality. In many cases, this can be achieved by modifying language in Adaptation Strategy Standards where “must” is used, to instead use phrases like “should seek to” and “to the extent feasible and appropriate.”

- 3. Hostility to New Development.** None of the strategy options provided alongside the Adaptation Strategy Standards indicate the ways that new development and private investment can deliver shoreline resilience improvements, despite the language in the Introduction and One Bay Vision sections of the RSAP which speak to these strategies. The Adaptation Strategy Standards only suggest increasing housing availability away from the shoreline, and even suggest downzoning of existing shoreline communities and a blanket ban on development of all “undeveloped land” on the shoreline. We are very worried that the Adaptation Strategy Standards, as written, would interfere with the implementation of state housing law.

Strengthening the region’s shoreline resilience, addressing the region’s housing crisis, and building transportation and other critical infrastructure aren’t mutually exclusive goals. On the contrary, investments in one are often necessary to unlock investments in the others. We appreciate the hard work and dedication that has gone into the development of the draft RSAP, and we look forward to a final plan that protects our natural resources while also promoting sustainable growth and development for the benefit of all Bay Area residents.

Thank you for considering our views.

Sincerely,



Draft Regional Shoreline Adaptation Plan for Public Comment

Deletions in ~~strikethrough~~.

Additions in **red text**.

Highlighted text: Explanatory comments, not proposed revisions

Adaptation Strategy Standards

The Adaptation Strategy Standards should be accompanied by a statement that communicates the following:

In light of the region's long-term structural housing shortage and resulting affordability crisis caused by decades of inadequately building housing, nothing in the RSAP is meant to override, conflict with, or frustrate the implementation of state housing law.

Maximize benefits of water-dependent shoreline uses and Baylands habitats.

Adaptation Strategy Standard	Strategy options to achieve this:
<p>1. Improve public access and connection to the shoreline.</p> <p>Areas along the Bay shoreline should seek to provide maximum feasible public access that maintains, increases, and/or enhances existing access. Public access should be compatible with Baylands habitat needs. In locations that currently have limited to no shoreline access, particularly in or near socially vulnerable and/ or Environmental Justice communities, expanding safe and reliable connections to public access should be prioritized. In the adaptation strategies, demonstrate and describe where and how public access is being maintained or improved. Areas along the Bay shoreline</p>	<ul style="list-style-type: none">• Increasing housing density in already-developed waterfront areas to enable more residents and families to live near the Bay, increasing public access to the shoreline

must provide maximum feasible public access that maintains, increases, and/or enhances existing access, including with respect to the connectivity of regionally significant waterfront parks, beaches and trails that cross jurisdictional boundaries.

Generally, we are concerned that the adaptation strategy standards so frequently use the word “must” where other language such as “should seek to” is more practical and realistic. Inclusion of qualifying phrases such as “to the extent feasible” would also help. We are concerned that the standards appear to enforce a one-size-fits all approach to the shoreline.

Additionally, we feel that some of the adaptation strategy standards could be consolidated in order to create a stronger set of standards. Section #2 could be eliminated by expanding Section #1 as recommended in the language above.

2. Improve connected regional shoreline access networks.

Areas along the Bay shoreline containing regionally significant waterfront parks, beaches, and trails **should seek to** preserve or improve the networked connectivity of these assets across jurisdictional boundaries to ensure public access connections are maintained and improved. In the adaptation strategies, demonstrate and describe how connectivity of regionally serving parks, beaches, and trails across jurisdictions will be maintained, including a description of coordination with neighboring jurisdictions and efforts to continue coordination as adaptation strategies are implemented and adjusted over time.

See comments on #1.

3. Prioritize water-dependent uses along the shoreline.

Areas along the Bay shoreline that are located within a BCDC priority use areas must prioritize water-dependent and water-oriented uses along the shoreline over uses that don't require a location along the shoreline. Prioritize means preserving, enhancing, or expanding water-dependent uses. Water-dependent uses include those that can only be carried out on, in, or adjacent to water, such as ferry terminals, ports, marinas, boat, kayak, or kite-surfing launches, fishing piers, and certain industries. Uses that enable and support water-dependent uses, such as multi-family housing within half a mile of ferry terminals, should also be prioritized. In the adaptation strategies, demonstrate and describe where and how water-dependent uses are being prioritized.

The Bay Area cannot meet its emissions reduction goals without reducing car dependency and transit only works when accompanied with appropriate density. Commuting by ferry emits 18g of CO2 per passenger kilometer vs. 128g for per single passenger car. Ferries are a water-oriented use, but they're dependent on upstream car commuters unless surrounded by density. As such, while multi-family housing may not qualify directly as a "water-dependent" or "water-oriented" use, multi-family housing does enable and support water-dependent and water-oriented uses, specifically ferry transit.

We recommend revising this section to specifically mention ferry terminals and multi-family housing near ferry terminals.

Further, we note that prioritizing water-dependent uses is a statutory requirement only for certain limited BCDC-designated shoreline areas. We

recommend specifying this, instead of the current language which appears to mandate as a general rule that “all areas along the Bay shoreline must prioritize water-dependent uses over uses that don’t require a shoreline location.”

The viability of water dependent uses, like all potential land uses, is limited by market demand, among other factors, and the Bay Area can only support so many marinas and kite-surfing launches. We are worried that preserving the entire Bay shoreline exclusively for water-dependent uses inevitably means preserving large portions of the shoreline for no use.

4. Improve Baylands habitats and facilitate their long-term survival.

Areas along the Bay shoreline with existing Baylands habitats **including areas with present or potential future connectivity across multiple jurisdictions, should** protect, restore, and/or enhance these habitats **where it is appropriate and feasible to do so** to meet regional habitat goals. Protection means continuing the functions and services the habitats provide as sea levels rise over time. Restoring means bringing back functions and services where they once existed. Enhancing means expanding the functions and services of habitats. Habitats do not need to be protected in place but should be able to migrate or be expanded so long as the functions are maintained or enhanced. This can be achieved by ensuring that the spatial extent, distribution, abundance, and conditions of habitat types can be maintained or improved as sea levels rise; identifying and designating marsh migration space and upland transition zones; and/or identifying opportunities to connect Baylands habitats to one another and to sustainable sources of water and sediment supply that will support natural adaptation processes and actions that

- Zoning to protect existing habitats
- Restoration and/or enhancement
- Ecotone levees that provide habitat space
- Re-connecting creeks to Baylands
- Conservation easements
- Designating overlay zones such as marsh migration space and upland transition zone

improve the connections among the Bay, watersheds, and uplands. Adaptation strategies that would significantly affect Bay resources, such as flood gates, **should generally** be avoided **when possible**. In the adaptation strategies, demonstrate and describe how Baylands habitats and their characteristics are expected to change from the existing conditions and **whether and** how they will be protected or improved. **In the adaptation strategies, demonstrate and describe where habitats currently, or have the potential to in the future, cross jurisdictional boundaries and describe coordination efforts with neighboring jurisdictions, private, state, and/or federal managers and/or landowners to maintain habitat connectivity for landscape-scale habitat processes.**

Once again, this section illustrates the importance of revising the word “must” to words like “should” and including qualifying language such as “when possible” or “to the extent feasible.”

We are concerned that the Adaptation Strategy Standards, as written, seem to mandate that local governments elevate the protection of open space over all other societal interests and statutory requirements. There are likely to be areas where jurisdictions must weigh tradeoffs between housing goals and habitat preservation goals, but the language at present adopts a strict one-size-fits-all approach. This is unlikely to be practical.

Additionally, Section 5 can be consolidated into Section 4 with the addition of the final proposed sentence.

5. Ensure complete and connected ecosystems.

Areas along the Bay shoreline where existing Baylands habitats cross jurisdictional boundaries must ensure that this habitat

- Zoning to protect existing habitats
- Restoration and/or enhancement
- Ecotone levees that provide habitat space
- Re-connecting creeks to Baylands
- Conservation easements

<p>connectivity is maintained or improved with adaptation. In the adaptation strategies, demonstrate and describe where habitats currently, or have the potential to in the future, cross jurisdictional boundaries and describe coordination efforts with neighboring jurisdictions, private, state, and/or federal managers and/or landowners to maintain habitat connectivity for landscape-scale habitat processes.</p> <p>We feel that this section can be encompassed by Section 4 with a small language addition.</p>	<ul style="list-style-type: none"> • Designating overlay zones such as marsh migration space and upland transition zone
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Improve community health, economic development, infrastructure, and housing needs.

Adaptation Strategy Standard	Strategy options to achieve this:
<p>6. Reduce flood risk in areas with existing development.</p> <p>Areas along the Bay shoreline with existing development — such as housing, commercial, industry — must minimize flood risk to existing development, communities, and resources to the maximum extent appropriate and feasible. through the end of the development's planned useful life. Strategies should consider a range of adaptation approaches to reduce flood risk, such as protection, avoidance, accommodation, relocation, and preparation, and these approaches can change over time through adaptation pathways. For example, this may occur when a strategy is no longer physically and/or economically or when development or land use patterns change. In the adaptation strategies, demonstrate and describe how flood risk reduction is being achieved for existing development at risk.</p> <p>We are concerned that the language in this section effectively proposes basing the phasing-out of homes, businesses, schools, and entire communities on the “useful life of</p>	<ul style="list-style-type: none"> • Sea level rise overlay zones • Real estate disclosures • Increase freeboard above BFE • Climate responsive standards and codes • Upzoning already-developed shoreline areas to attract private investment in sea level rise adaptation improvements alongside new development • Private investment in shoreline commercial and residential development and other water dependent uses to assist with capital needs. • Grey flood protection where nature-based strategies are not appropriate or feasible.

the development.”

This adaptation strategy standard, as well as various others, seems to prioritize retreat in all instances and sites along the shoreline over opportunities for protection and adaptation. Language elsewhere in the RSAP, such as on Page 30, describes these strategies as complementary to one another, and emphasizes that different strategies will work best in different sites. This does not appear to be the approach of the adaptation strategy standards as written.

Once again, qualifying language such as “should” or “to the extent possible” would help address this issue. It is important that the adaptation strategy standards do not present retreat as the solely prioritized strategy for the entire shoreline.

In fact - perhaps the most effective way to protect these communities with existing development, and the most promising way to attract private investment to pay for the region’s sea level rise adaptation needs, would be to zone these areas for increased capacity so that new development with higher standards for sea level rise adaptation can bring these improvements.

As such, we recommend adding strategy options to attract private investment in shoreline adaptation.

Perhaps there really should be an entirely new adaptation strategy standard about attracting private investment through redevelopment of already-developed areas of the shoreline to fund sea level rise adaptation. See below for some suggested language.

7. Include actions to mitigate involuntary displacement risk.

Areas along the Bay shoreline with identified

- Anti-displacement policies

If “Anti-displacement policies” refers to a specific list or toolkit of anti-displacement

risk of displacement must include policies aimed at reducing displacement risk. Analysis of displacement risk and policies for reducing displacement risk should **inform future updates to the local certified General Plan Housing Element** ~~revisit, and, if necessary, revise local displacement policies in the local certified General Plan Housing Element to consider additional measures associated with displacement caused by future flooding due to sea level rise.~~ In the adaptation strategies, include policies aimed at reducing displacement for populations identified at risk. **This can best be achieved by increasing housing density in the jurisdiction outside areas of risk, accompanied by adoption of local preference policies for new affordable housing.**

We are concerned that the language, as written, would suggest that local Housing Elements be modified. Local displacement policies are not necessarily contained in Housing Elements and the Housing Element update process is statutorily prescribed both in terms of timing and content and subject to approval by a separate state agency (California Department of Housing and Community Development). If the intent of the language is to inform future updates to Housing Elements, it should specify so.

The most important steps that jurisdictions can take to mitigate involuntary displacement risk is to expand the supply of housing available in the jurisdiction. This can be accompanied by Local Preference Policies for affordable housing. We recommend that this be stated in the adaptation strategy standard and the accompanying strategy options.

8. Address the region's housing crisis while promoting safe, sustainable and strategic growth and density.

When implementing housing element law and other fair share housing mandates, include

policies, we suggest that it specify so. Regardless, we recommend adding the following:

- Increasing density outside areas of risk and adopting Local Preference Policies for new affordable housing
- Exceeding minimum RHNA housing production targets to ensure adequate housing options are available for current and future residents
- Grey flood protection where nature-based not appropriate or feasible
- Private investment in shoreline commercial and residential development and other water dependent uses to assist with capital needs

- Transfer of Development Rights
- Climate overlay zone
- Rolling easements
- Downzoning in flood zones
- Shoreline setbacks
- Increasing density or clustering

effective measures that address changing future flood risks, such as plans and policies that result in development and infrastructure that is resilient to sea level rise and adaptable over time. When local conditions allow for it, consider how variations in zoning can enable greater levels of density in areas not exposed to coastal flood hazards within the growth geography. In the adaptation strategies, demonstrate and describe the relationship between mandatory state fair share planning requirements including affirmatively furthering fair housing and safe and sustainable growth geographies with respect to reducing future flood risks.

In order to mitigate displacement risk and meet regional housing goals, communities that consider downzoning in flood prone areas should demonstrate how they are increasing allowable density elsewhere. Further, communities may consider increasing allowable density in shoreline areas where appropriate in order to facilitate delivering shoreline adaptation needs through privately funded redevelopment.

We are concerned by the implications of this text on controlling state law on this subject, which requires each region's Council of Governments (ABAG) to adopt a Regional Housing Needs Allocation (RHNA) obligating each city and county in the Bay Area to general plan and zone adequate sites to accommodate the number of housing units allocated to the jurisdiction by the RHNA.

Existing state law makes clear that, while environmental concerns are mandatory factors to be considered in the RHNA and Housing Element update processes, they do share housing laws. We are concerned that this language mandates that the designated growth geographies be prioritized over other shoreline areas for growth, despite what may otherwise have been approved in their

development outside areas of risk

- Upzoning already-developed shoreline areas to attract private investment in sea level rise adaptation improvements alongside new development
- Avoidance opportunities
- Real estate disclosures
- Increase freeboard above BFE
- Climate responsive standards and codes
- Streamlining housing approvals in appropriate areas
- Exceeding minimum RHNA targets in other areas
- Private investment in shoreline commercial and residential development and other water dependent uses to assist with capital needs

If the RSAP is going to identify "Downzoning in flood zones" as a strategy option, we feel that it should certainly also include upzoning already-developed shoreline areas to attract private investment in sea level adaptation improvements alongside new development.

<p>Housing Element.</p>	
<p>9. Maintain reliable critical and emergency services and critical infrastructure.</p> <p>Areas along the Bay shoreline containing identified emergency operation centers, publicly owned wastewater treatment works, and healthcare facilities and other critical infrastructure must include effective strategies to ensure the continued function of these services. Continued function may be dependent upon preserving the asset or other systems the asset relies on, such as energy, water, transportation, etc., but could also consider a range of adaptation approaches to reduce flood risk, such as protection, avoidance, accommodation, relocation, and preparation. Critical infrastructure may also be water dependent. These approaches can change over time through adaptation pathways. In the adaptation strategies, demonstrate and describe how the functions of critical and emergency services are being maintained over time. For assets not owned or operated by a local government, provide a description of what coordination efforts are occurring with appropriate agencies to maintain these services.</p>	<ul style="list-style-type: none"> ● Incorporating adaptation into future changes such as significant upgrades, maintenance, and repairs, and/or siting of new infrastructure. ● Siting new infrastructure outside of flood risk areas ● Protecting the asset in place ● Shifting the asset to maintain relationship to future shorelines (for water-dependent infrastructure)
<p>10. Maintain regional movement of people and goods.</p> <p>Areas along the Bay shoreline containing identified regionally significant transportation infrastructure must include effective strategies to ensure the continued functioning of these services. Continued functioning could be achieved through a range of adaptation approaches to reduce flood risk, such as protection, avoidance, accommodation, relocation, and preparation, and these approaches can change over time through adaptation pathways. In the adaptation strategies, demonstrate and describe how transportation assets and the connected</p>	<ul style="list-style-type: none"> ● Incorporating adaptation into future changes such as significant upgrades, maintenance, and repairs, and/or siting of new infrastructure. ● Siting new infrastructure outside of flood risk areas ● Protecting the asset in place ● Realigning or shifting the asset to maintain relationship to future shorelines (for water-dependent infrastructure)

<p>systems upon which these services depend maintain their function over time. For assets not owned or operated by a local government, provide a description of what coordination efforts are occurring with appropriate agencies to maintain these services, such as the California Department of Transportation (Caltrans), Bay Area Rapid Transit (BART), ports, airports, Water Emergency Transportation Authority (WETA) and other agencies.</p>	
<p>11. Reduce contamination risks in Environmental Justice communities.</p> <p>Areas along the Bay shoreline containing identified contaminated sites in Environmental Justice communities must identify strategies to advance remediation and reduce risks of toxic materials mobilization and vaporization in communities due to flooding. This should include analysis of how planned adaptation will prevent mobilization of contaminants or demonstration of how coordination with a lead regulatory agency is being conducted for prevention purposes (where appropriate). In the adaptation strategies, demonstrate and describe where and how remediation is being prioritized and what coordination is occurring with the responsible parties and regulatory agencies, which may include the U.S. EPA Region IX, the California Environmental Protection Agency's (Cal/EPA's) State Water Resources and Control Board and/or Regional Boards, the Cal/EPA's Department of Toxic Substances Control, and/or a County's Department of Environmental Health, or the Local Oversight Program (LOP).</p>	
<p>12. Use nature-based adaptation where feasible.</p> <p>In areas along the Bay shoreline where protection approaches for flood risk reduction</p>	<ul style="list-style-type: none"> ● Beaches with backing levee or fortified seawall ● Ecotone levee ● Living seawall ● Shellfish reefs

<p>are utilized, adaptation must incorporate natural and nature-based adaptation strategies suitable to the landscape to the greatest extent feasible before using traditional hardscape approaches. Where nature-based adaptation is deemed infeasible, approaches should incorporate habitat enhancements (i.e., utilizing hybrid approaches). In the adaptation strategies, demonstrate and describe the suitability of nature-based solutions and where nature-based adaptation is used, or habitat enhancements are incorporated.</p>	<ul style="list-style-type: none"> ● Submerged aquatic vegetation ● Mudflat augmentation ● Protecting, maintaining, or restoring tidal marshes ● Gray or traditional hardscape where nature-based adaptation is not feasible
<p>13. Appropriately utilize Bay fill for shoreline protection.</p> <p>In areas along the Bay shoreline where protection approaches for flood risk reduction are utilized, adaptation must appropriately utilize bay fill. This means that bay fill must be avoided or minimized for new hardscape or traditional engineering approaches, but Bay fill for the purpose of habitat restoration and/or nature-based adaptation may be appropriate. If fill is necessary, include an analysis of why the public benefits of the fill exceed the public detriment, why the fill has not alternative upland location, is the minimum amount necessary for the strategy, would be constructed with sound safety standards, and minimizes impacts to Bay resources. Measures should be evaluated to determine whether they will require future Bay fill to remain effective, and measures that avoid or reduce the likely need for future Bay fill should be prioritized. In the adaptation strategies, demonstrate and describe how the strategies avoid and minimize fill for the sole purpose of shoreline protection.</p>	
<p>14. Integrate multiple benefits into adaptation.</p> <p>In areas along the Bay where protection approaches for flood risk reduction are utilized, adaptation projects must incorporate</p>	

multiple benefits whenever possible. This could include opportunities to advance the One Bay Vision goals, such as advancing equity and community benefits, **addressing the region's housing crisis**, improvements to shoreline public access, opportunities to improve transit and increase low-emissions mobility, and/or improve Baylands habitats. In the adaptation strategies, demonstrate and describe how benefits beyond flood risk reduction were considered and incorporated.

Especially since new revenue-generating uses on the shoreline will represent a critical strategy to attract private investment in shoreline adaptation, it is important that housing be included as one of many benefits that can be delivered alongside adaptation goals.

?? Incentivize private investment in shoreline adaptation

In already-developed areas of the Bay shoreline, jurisdictions should consider and pursue policies to attract private investment in shoreline adaptation. This could include zoning changes or incentives to attract new development on the shoreline in appropriate locations to generate new economic growth, with the project being required to deliver sea level rise adaptation within and potentially beyond the immediate project area. This could also include developing financing mechanisms to capture the value of nearby private development to be invested in shoreline adaptation improvements. This could also include jurisdictions pursuing public private partnerships with major private landowners and corporate campuses to create cost-sharing agreements for shoreline adaptation projects.

We recommend adding an additional adaptation strategy standard to focus on attracting private investment in shoreline adaptation. Alternatively, these ideas can be

- Increasing allowable density in already-developed areas on the Bay shoreline
- Tax increment financing or benefit assessment districts to raise funds from new development for shoreline adaptation
- Public private partnerships with major private landowners and corporate campuses to create cost-sharing agreements for shoreline adaptation projects

<p>incorporated into other adaptation strategy standards where appropriate.</p> <p>Generally, we feel that the adaptation strategy standards need to speak more explicitly to opportunities to enlist private sector support in order to be effective. With a \$105 funding gap for shoreline adaptation, jurisdictions will not be effective in meeting their goals without expressly pursuing private sector support for adaptation through their shoreline adaptation plans.</p>	
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Create pathways to respond to changing flood risks over time.

Adaptation Strategy Standard	Strategy options to achieve this:
<p>15. Preserve natural and undeveloped lands and open space.</p> <p>Jurisdictions should seek to protect or expand tidal marshes, wetlands, and existing natural lands along the Bay shoreline where possible and practical to provide shoreline resilience, public access, buffer space for future adaptation protection structures, and/or space for wetlands migration space or upland transition zone. In the adaptation strategies, demonstrate and describe where and how existing natural lands, open spaces, and undeveloped shoreline areas are being preserved and designated for shoreline resilience.</p> <p>We are concerned that, as written, this is a sweeping ban on development of all undeveloped land across the entire Bay's shoreline. Jurisdictions have a number of priorities and challenging tradeoffs to consider, including societal interests such as housing, jobs, and economic health, but this language does not appear to recognize that nuance.</p>	<ul style="list-style-type: none"> ● Zoning to maintain natural or open space ● Land acquisition ● Re-zoning ● Sea level rise overlay zones ● Conservation easements ● Transfer of development rights

<p>We absolutely agree with the need to protect and expand tidal marshes and wetlands. This language, however, is much broader. We are concerned that this language suggests that the Adaptation Strategy Standards are oriented towards retreat and retreat alone as a legitimate sea level rise adaptation strategy.</p> <p>The word “must” is the greatest issue here. We also take issue with the overbroad phrase “undeveloped lands.”</p>	
<p>16. Incorporate climate-responsive standards and codes for adaptive design.</p> <p>Areas along the Bay shoreline containing assets and/or Baylands habitats at risk of flooding must incorporate standards and codes that incorporate adaptive design into new, retrofit, or rebuilt infrastructure. This must include standards, codes, and/ or policies that address shallow groundwater and groundwater emergence flood risks. These standards may be used in areas where protection is not appropriate or may be used in addition to shoreline protection. In the adaptation strategies, demonstrate and describe what standards and codes for climate-responsive designs are incorporated.</p>	<ul style="list-style-type: none"> ● Wet or dry proofing ● Increasing design heights of ground floor ● Climate-adapted vegetation ● Increased capacity for stormwater infrastructure ● Designing infrastructure to be adaptable to future flood risks ● Limiting below ground and ground floor uses ● Elevating or flood proofing water and salt sensitive components and equipment (e.g., heating and cooling units, generators, electrical controls)
<p>17. Plan for changes in land use, removal of assets, and/or equitable relocation.</p> <p>Areas along the Bay shoreline containing assets or development at risk of flooding should consider and weigh the benefits and risks of incorporating policies, regulations, and/ or financial incentives that allow for transitions at the end of the asset or development’s life cycle, including planned removal or relocation of assets. Removal or relocation of assets should be prioritized in areas suitable for marsh migration space and upland transition zone. Removal should</p>	<ul style="list-style-type: none"> ● Increasing density outside areas of risk ● Avoidance opportunities ● Rolling easements ● Downzoning in flood zones ● Transfer of Development Rights

include structures, foundations, utilities and infrastructure both above and below ground to ensure that aging and dilapidated development does not lead to future Bay fill and contamination. In the adaptation strategies, demonstrate and describe the policies, regulations, and/or financial incentives included and timeline for implementation.

Elsewhere in the RSAP, retreat is considered one of multiple approaches, alongside accommodating and protecting and preparing. This section, however, as written, suggests once again that retreat is the primary approach jurisdictions should pursue across the entirety of the shoreline.

Retreat and relocation are important options that must be considered depending on the site and the circumstance. This standard proposes abandoning shoreline communities and *requiring* them to plan for their removal, rather than encouraging planning for adaptation. This language as written would seem to eventually designate all areas on the shoreline with existing assets, as they will all be at risk of flooding as sea levels rise, as so-called "sacrifice zones." This does not feel complimentary to ongoing efforts to adapt the shoreline to rising tides to protect existing infrastructure and communities.

Establishing that future investment in the shoreline beyond the useful life of current structures will be impossible will make attracting any private investment in shoreline adaptation today impossible as well.

Once again, "must" is a challenging verb here.

18. Identify actions necessary to enable future adaptation decisions, if currently not available.

Areas where future adaptation pathways

<p>could provide effective flood risk reduction but are considered infeasible by current conditions (such as existing knowledge, values, and rules in society¹) should identify what actions would likely be necessary to facilitate changes to the future context in which decisions are made. In the adaptation strategies, describe existing barriers and changes in knowledge, values, or rules that would be needed to achieve desired options of adaptation pathways.</p>	
<p>19. Develop and maintain cross-jurisdictional flood risk reduction.</p> <p>Areas along the Bay shoreline identified as containing high shoreline connectivity across jurisdictional boundaries must include measures to effectively coordinate to develop cross-jurisdictional flood risk reduction responses and plan for future coordination and/or governance to maintain flood risk reduction. This should include considerations for creating redundant flood protections such as berms to reduce the likelihood of flooding from flood protection failure originating in adjacent jurisdictions and hydrologically evaluating significant changes to basins that would hydrologically disconnect them in areas with in-bay hydrological impacts. In the adaptation strategies, demonstrate and describe adaptation coordination and approaches for reducing flood risk across jurisdictional boundaries.</p>	<ul style="list-style-type: none"> • Development of formal cross-jurisdictional governance such as Joint Powers Authority (JPA), Memorandums of Understanding (MOUs), or legislation
<p>20. Evaluate and minimize consequences of failure.</p> <p>In areas along the Bay where protection approaches for flood risk reduction are utilized, flood protection must be designed to minimize the consequences of failure. This should include an analysis of causes and consequences of failure, such as future coastal flood hazards, local geological soil conditions, earthquake and liquefaction risk,</p>	

and the projection of current and potential future populations that would be at risk in the event of a flood protection failure. In the adaptation strategies, describe the potential impacts of flood protection failure, the likelihood of failure, and how risks of failure are being minimized.	
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Regional Shoreline Adaptation Plan

Section 2.3.3 Development, Housing, & Land Use

Section 2.2.3 on Development, Housing, & Land Use speaks compellingly to the importance of new housing and development to the region's future and acknowledges the complexity and nuances of competing interests on the shoreline that jurisdictions will face.

However, we feel strongly that the plan should be revised to reflect that "housing," not just "affordable housing," is essential to the region's ability to meet growth needs. Further, the plan should refer to the "housing crisis" rather than the "affordable housing crisis."

The phrase "Affordable housing" refers specifically to deed-restricted housing units not produced by the private sector rather than the affordability of housing generally. While "affordable housing" is unquestionably an urgent need, it is but one component of the far greater housing shortage that the region is grappling with. There is an urgent need for all types of housing, including housing that is affordable for all income levels. In fact, important legislation (AB 1893, Wicks) recently signed by Governor Newsom finds and declares that building market rate housing is essential to providing affordable housing generally, and numerous studies from the California Legislative Analyst and elsewhere have concluded the shortage of market rate housing is among the largest contributors to California's high rate of homelessness. Rapidly accelerating market rate housing production now is the only way to ensure a greater stock of naturally affordable housing for California's future. By only referring to "affordable housing" as "essential to the region's ability to meet growth needs," the plan invites jurisdictions to adopt policies hostile to new housing, so long as they make exemptions for "affordable housing." That approach would ensure that the housing crisis is never mitigated.

We recommend that the plan refer holistically to the “housing crisis,” not an “affordable housing crisis.” Such language, while well-intended, represents a form of denialism about the nature of our crisis and the solutions.

Relatedly, we note that the Regional Housing Needs Allocation process (adopted by ABAG) is the more legally binding regional planning requirement that local governments must adhere to when they adopt their housing elements than Plan Bay Area. As such, the RSAP should recognize its importance alongside Plan Bay Area. By state law (Gov't Code 65584), local housing elements must implement RHNA as it is adopted by ABAG. Importantly, also by state law, RHNA must advance a broader set of social values than Plan Bay Area.

We recommend that in this section and elsewhere in the plan, where the RSAP refers to growth plans under Plan Bay Area, the plan also refer to jurisdictions' Regional Housing Needs Allocation approved by ABAG. Like so: "MTC/ABAG's Plan Bay Area and Regional Housing Needs Allocation are..." (Page 57)

COMMENT #214

PDF – Cheryl Patel

October 15, 2024

San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105

Re: Regional Shoreline Adaptation Plan Draft

Dear Commissioners,

My name is Cheryl Patel. I am a Bay Area resident who grew up on the shores of the San Francisco Bay (SF Bay). Now I work to protect this shared resource for communities and wildlife who call it home. I live in San Francisco and work in Oakland, and I am writing to you regarding the Regional Shoreline Adaptation Plan (RSAP) draft as a private citizen.

I had the unique opportunity to see how special the SF Bay ecosystem is as a graduate student conducting field research in the upper estuary. Not only did I study and appreciate the system from an ecological perspective, but I also got to understand the different ways humans exist in and around the SF Bay ecosystem. The ecosystem is part of our heritage and as such, it is imperative that our climate change adaptation strategies are set up to prioritize the SF Bay ecosystem's health, function, and longevity.

Let me start by commending the Commission's work on this draft. It is clearly thoughtfully crafted. I am heartened to see that the RSAP places due focus on nature-based solutions, equity, and the overall enhancement of the SF Bay's ecosystem health. Even with such a promising draft, I believe the document can be further enhanced to give SF Bay the best possible chance to improve ecosystem health and overall longevity as a region. Below I list five specific changes that can enhance the RSAP so it can better set up the SF Bay and surrounding communities for success as we adapt to our changing world.

As a guidance document, it is imperative that the RSAP be made clearer. By that I mean the document is made easy to navigate, simple to interpret meaning, and clear in the goals, expectations, and instructions listed. Improving clarity of the document will ensure that all stakeholders are able to access, understand and uphold the plan.

Eminent sea level rise puts SF Bay ecosystems on the front lines. These ecosystems are at risk, but we can address the risk by realizing the invaluable opportunity we have in enhancing the RSAP. I call on the Commission to prioritize SF Bay ecosystem health and recognize its responsibility for community and economic wellbeing, as well as global biodiversity by making ecosystem health a core consideration throughout the planning process.

We need to look at SF Bay beyond the ecological benefits it provides humans. The ecosystem is inherently invaluable, and its health is directly integrated with the health of our human communities. Thus, I call on the Commission to clarify requirements to ensure nature and nature-based solutions be prioritized and implemented wherever feasible. This would entail integrating adaptation standards safeguarding ecosystem health into element checklists. It would also entail

ensuring implemented adaptations strategies “do no harm” to ecosystem health and resilience by adding this requirement to element checklists using appropriate clear language.

The science is clear that sea level rise will lead to groundwater rise. The science is also clear that groundwater rise will lead to the migration of and likely exposure to toxic contaminants. Thus, I call on the Commission to strengthen groundwater rise and contamination standards in the RSAP. We should expand the environmental justice (EJ) standard to account for other risks of groundwater rise beyond just flooding such as toxic contamination. We should also add a contamination standard for non-EJ communities.

Finally, the RSAP should strengthen the protection and enhancement of SF Bay ecosystem health by defining metrics for habitat goals. Current language in the RSAP requires strategies to support “habitat goals” but does not provide or require metrics for this. I call on the Commission to create a new standard that defines measurable habitat goals and requires plans to demonstrate contributions to those goals so BCDC can track progress and ensure accountability.

This planning document is a valuable opportunity for the Bay Area to make adaptation choices that benefit the larger ecosystem and thus every living organism in the region. The SF Bay’s history is fraught with negative human impacts. We know better now, so I hope we can make the better foundational choices and prove to future generations that we’ve learned from our past.

Sincerely,
Cheryl Patel

COMMENT #215

From: Corwin Zechar (ernfast@gmail.com) Sent You a Personal Message <kwautomail@phone2action.com>
Sent: Wednesday, October 16, 2024 11:48 PM
To: BCDC PublicComment <publiccomment@bccdc.ca.gov>
Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
To sustainably and cost-effectively protect the Bay Area, please consider the following:

1. Prioritize ecosystem health and NNBS at every step
NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems are essential to our communities, our economy, and global biodiversity. They are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

* The RSAP should prioritize Baylands health by making NNBS and habitat ecosystems core considerations for every aspect of SLR plan development. As an example, mapping of opportunities for NNBS, including habitat migration, should be included in the checklists for each Strategic Regional Priority.

2. Clarify requirements and emphasize ecosystem health standards
Inconsistent reference to requirements between and among the Vision Statements, the "required assets and actions" in Section 2, and the Standards in Section 3 may create confusion and hinder progress. Much like the equity assessment, Ecosystem health Standards should be explicitly required in each RSAP element and checklist, ensuring clarity, compliance, and successful implementation.

3. Strengthen Groundwater and Contamination Standards
SLR poses significant contamination risks from toxic sites and landfills along the shoreline. While the RSAP includes a narrow standard for reducing contamination risks due to flooding in socially vulnerable, environmental justice (EJ) communities, it fails

to address non-emergent groundwater rise and soil disruption related to adaptation projects themselves. The RSAP currently also lacks any contamination Standard for non-EJ communities.??

* Expand Contamination Standards\nBroaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

4. Define Metrics for Habitat Goals

The RSAP includes a Standard that requires protection, restoration, and/or enhancement of Baylands habitats to ?meet habitat goals,? but these goals are neither defined or quantified.?

* The RSAP should establish clear, measurable habitat goals and require each local plan to specify how it will contribute to them, and BCDC should monitor and report on progress toward these targets to ensure accountability and success.

This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

Corwin Zechar

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #216

PDF – Jan de Jager

From: [Jan de Jager](#)
To: [BCDC PublicComment](#)
Cc: [Perrin-Martinez, Jaclyn@BCDC](#); [Jan Huijbers](#)
Subject: RSAP, Public Comment - Email 1 of 2, SFBay Adapt: Regional Shoreline Adaption Plan, a Submission for thought, from The Netherlands: Bring The Dutch Polder Solution to San Francisco Bay and the Delta lands around Sacramento and Stockton.
Date: Thursday, October 17, 2024 1:42:33 AM
Attachments: [Logo tbv_email Herik & Nautilus Coastal-Solutions.kopie.png](#)
[2022 CremenFrige Sea-level Rise: Could The Netherland Polder System Work in the U.S..pdf](#)
[San Francisco Bay, Sea-Dike & The-Dutch-Polder-Solution_final.pdf](#)
[16-11-2021 revis. 1 - ESSAY The Dutch Polder Solution for USA & annex proposal for San Francisco Bay Area.pdf](#)
[16-11-2021 revis. 1 - \(text only\) ESSAY The Dutch Polder Solution for USA 2.pdf](#)

Some people who received this message don't often get email from nautilus.coastal.solutions@gmail.com. [Learn why this is important](#)

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Email 1 of 2, SFBay Adapt: Regional Shoreline Adaption Plan:

(Earlier, on October 11, 2024 already send to mrs. Jaclyn Perrin-Martinez):

SUBJECT: RSAP, Public Comment:

From:

Van den Herik Sliedrecht in JV with Nautilus Coastal Solutions,
both private companies from The Netherlands,

To:

San Francisco Bay Conservation and Development Commission,
375 Beale Street,
Suite 510,
San Francisco, 94105.

Dear Members of the BCD Commission,

Via your organisation's electronic newsletter called: BAY ADAPT, Regional Shoreline Adaption Plan, the undersigned companies: Van den Herik Sliedrecht in JV with Nautilus Coastal Solutions, have been following your plans to make San Francisco Bay: Sea Level Rise proof for some time.

We would like to make use of your offer to receive comments from the public at large about the SFBay: Regional Shoreline Adaption Plan.

This is a gigantic task, which might require a kind of "Manhattan Type Project-organisation" to achieve the results the various Bay Area Governments, inhabitants and businesses are looking for.

In addition to the Bay Adapt plans, we understand an other huge project is being considered east of SFBay, called: The Delta Conveyance Project, an USD 20 Billion project, to be realised in the northern-eastern section of the Sacramento and Stockton agricultural valley (delta lands), with the purpose to mitigate the effects of saltwater intrusion into these Delta Lands. The purpose of The Delta Conveyance Project is to secure sweet water security for citizens and plants in this region and the regions beyond.

We, the undersigned: The Dutch Polder Builders, would like to propose to combine and integrate: **The BAY ADAPT**, Regional Shoreline Adaption Plan **WITH** the **The Delta Conveyance Project**, **together with: The Golden Gate Sea-dike Project**, please see the enclosed pdf.documents outlining and describing the proposal from Van den Herik Sliedrecht in JV with Nautilus Coastal Solutions, to be situated near the Golden Gate Bridge.

By doing so the major advantages are, generally speaking:

1) the SFBay Shoreline Adaption Plan will be reduced to only approx. the 3,5 mile long **Golden Gate Sea-dike**, instead of approx. 400 miles of Bay Shoreline;

2) the saltwater intrusions into the Sacramento - Stockton agricultural lands will stop, because the SFBay saltwaters wil become sweetwater in due time, making The Delta Conveyance Project no longer necessary, freeing USD 20 Billion investment available for the **The Golden Gate Sea-dike Project!**, with a huge number of other advantages described in our enclosed Essay titled:

Sea Level Rise, what to do?

We with you all the best with achieving your goal to make the SFBay sea level rise safe and climate change proof.

We are available to answer your questions.

Many regards,
Ing. Jan H. de Jager, managing director.



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OPINION

Sea-Level Rise: Could The Netherlands' Polder System Work in the U.S.?

02.08.2022

By Jan H. de Jager

In April 1782, just six years after the Declaration of Independence was signed, John Adams arrived in Amsterdam as the first U.S. Ambassador to The Netherlands. Three months later, a consortium of Dutch bankers provided a 5 million guilder loan (equivalent to \$150 billion today) to the new republic, a clear sign of my country's confidence in the U.S. While I can't provide a loan, as a Dutch water engineer I can offer something else to Americans: my country's five centuries of experience living, working, and thriving below sea level. This is surely knowledge and knowhow that the U.S. will desperately need as water levels continue to rise and countless coastal communities are threatened.

Sea-level rise will, of course, affect coastal communities all over the world. However, due to its vast amount of coastline—the National Oceanic and Atmospheric Administration estimates it to be about 95,000 miles—the U.S. will be particularly vulnerable. It is difficult to put a precise number on exactly how high sea levels will rise—it's what scientists call a *fluid* model—but

according to the **government agency**, “a worst-case scenario of as much as 8.2 feet (2.5 meters) above 2000 levels by 2100 cannot be ruled out.” And water levels won’t rise independent of other ecological factors; increasingly strong hurricanes and storms due to climate change, rising air and water temperatures, coastal erosion, and flooding will further exacerbate stress on coastal communities.

A 2018 report from the **Global Change Research Project** estimated that there are nearly 50 million U.S. housing units in danger of eventual flooding. Some **communities**—in limited, halting numbers—have already begun their begrudging retreat. Some cities are considering storm-surge barriers and seawalls. However, such structures are not only expensive CO2 bombs because of the heavy reliance on concrete as a building material, but they are of limited effectiveness, good for a few decades at most. And, truth be told, not all of the coastline will be defensible. Some land will have to be surrendered back to the sea. But the decision to abandon heavily populated cities would be economically catastrophic and politically fraught. I (and other engineers) strongly believe that some form of the Dutch Polder Solution, an integration of hard and soft, nature-based infrastructure, would be capable of protecting threatened coastal communities in the U.S.

Before outlining our pilot projects for three American cities, some history is in order. Most people in The Netherlands live, as their predecessors have for 485 years, within the boundaries of the great European Rhine/Meus/Scheldt River Delta, in low-lying **polders**. This includes the inhabitants of our largest cities: Amsterdam (the capital), Rotterdam (the world’s third-largest port), The Hague (the government seat), Utrecht, and Haarlem.

Polders are large land-and-water areas, fully surrounded by dikes, where the ground elevation is situated below mean sea level (MSL) and the water table within the polder is controlled by engineers. About 50% of the overall land and water mass of The Netherlands is situated in polders, and always below MSL.

To be able to live safely in such an environment, extensive infrastructure is required: sea and river dikes, drainage canals, temporary water-storage basins, and pumps, along with sufficient financing for the management and maintenance of all of these systems. The financing for all necessary infrastructure in The Netherlands is primarily provided by the central government, but residents benefitting from these protective structures and services pay for it with a monthly fee. A fully integrated, public, statewide water-management agency, the so-called Water Board, is responsible for designing, constructing, managing, and maintaining all polder infrastructure.

Is some version of the Dutch Polder solution a feasible one for the U.S.? Culturally and politically, it’s an open question. We know the polder-and-dike system works for us. We also understand the low levels of trust that Americans now have for their government, and how state and local governments have struggled to complete large infrastructure projects on time

and within budget. If we take the imminent dangers of sea level rise seriously, this must change. Time is already perilously short. Considering the increasing rate of sea-level rise and the slow pace of global efforts to reduce carbon emissions, the U.S. faces a stark choice: design, build, and maintain the appropriate water infrastructure, or move to higher ground.

To successfully execute and complete the design and construction phases of these projects, we recommend the establishment of a federal government agency, working in collaboration with the U.S. Army Corps of Engineers; it could be called the Coastal Security Agency. To guarantee adequate maintenance and management, it would be staffed with engineers and scientists and sufficiently financed for decades to come. Now, let's be honest here: the costs will be high (but the cost of doing nothing will be multiples higher), the timelines long, and the politics no doubt very complicated. But there aren't many other options at this point. We've outlined plans for three cities, but it goes without saying that many other U.S. cities, towns, and regions are already at severe risk.

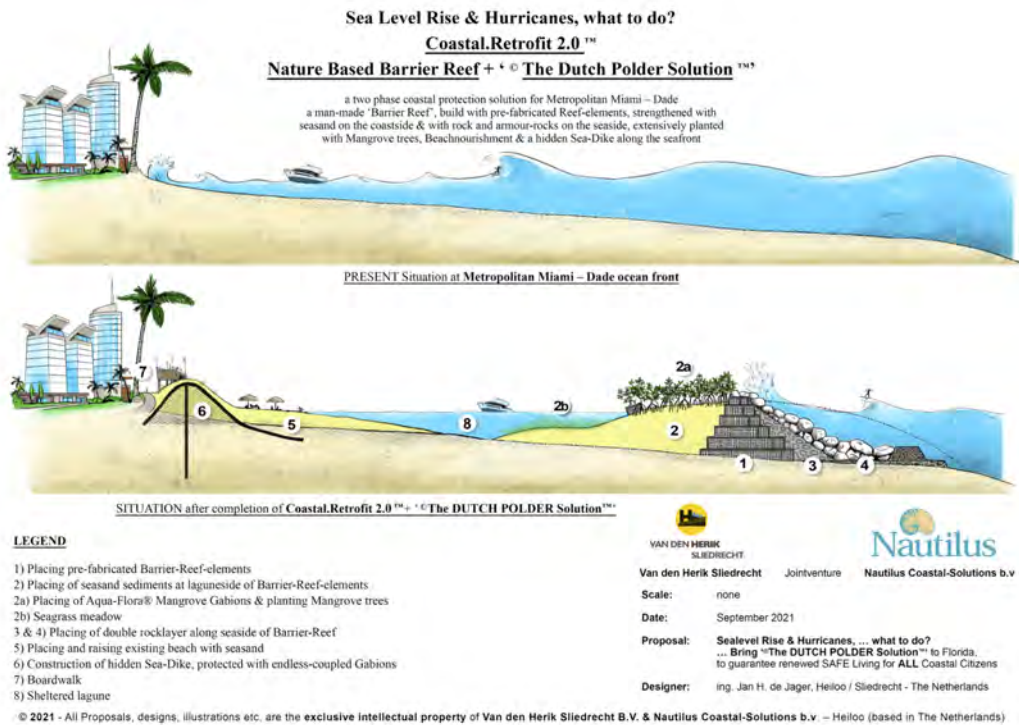


BOSTON

We propose completely separating the greater Charles, Mystic, and Neponset River estuaries and the waters of Boston Harbor from the rising waters of the Atlantic Ocean by means of a robust, nature-based sea dike. This would comprise three sections, starting from the mainland at the Pemberton-Hull Peninsula, toward Georges Island and Lovell Island, until it reached Deer Island in the north. These three sections will significantly shorten the current shoreline along Boston Harbor Bay and safeguard the metropolitan area against sea-level rise and coastal flooding.

Within the now-enclosed Boston Harbor Bay, auxiliary dikes would need to be built, along with a water level monitoring system, with pumping stations and spillway/water inlet structures, enabling full control of the harbor water table, including control of algae growth. In addition, depending on specific site and shoreline conditions, other structures and services will be necessary to protect buildings, infrastructures, transportation systems, sewage systems, and water-treatment plants, as well the inner bay wetlands and their crucial biodiversity.

Two locks will also be included within the sea dike: a large one to facilitate ocean vessels serving the port, and a small one for recreational boating. Some of these ideas were already presented in a report, *Designing With WATER: Creative Solutions From Across the Globe*, prepared in 2014 on behalf of the **Boston Harbor Association**. The study proposed moving the port facilities to the bayside of their proposed Harbor Island Barrier, a move that can easily be accommodated in our Dutch polder solution.



MIAMI-DADE COUNTY

The coastal situation in Miami-Dade County is very different and certainly much more challenging than the other two proposals presented in this essay. Last year the county commission rejected a \$4.6 billion proposal to install floodgates and 10-foot-high seawalls to protect downtown Miami. Instead, the county wants natural solutions, such as barrier islands and mangrove trees. Other cities are exploring similar approaches: installing living shorelines, recreating salt marshes and wetlands, creating manmade oyster beds, constructing local flood protections with parks and open spaces. These measures are certainly useful and should continue, but they will probably not

be sufficient enough to stay ahead of the current rate of sea-level rise and the intensifying forces of storms and hurricanes.

Our proposal for Miami-Dade: Coastal.Retrofit 2.0, is a nature-based solution that involves building a barrier reef (1) approximately 500 meters from the shoreline. A hidden sea-dike (6), situated directly underneath the raised beach (5), will be the main structure protecting the city. In between these two structures, a quiet lagoon (8) is created. The wetlands (2) created by the new barrier reef facing the lagoon will be extensively planted with mangrove trees (2a) and below the water table with eelgrass meadows (2b). The sand required for raising the beaches (5) and establishing the barrier reef wetland (2) will be excavated from the Atlantic Ocean bottom with hopper dredges, at least 10 miles away from the present coastline.

Additional structures, including inland cross-dikes, will be required to compartmentalize and control the inland water table. Using the existing canals and waterways for these cross-dikes will minimize landscape and waterway disturbances. Large water-pumping stations and spillway and water-inlet structures will be required, enabling full control of the water table, including the ability to control algae growth and protect biodiversity. A large lock will have to be built to facilitate the passage of cruise ships and other commercial ocean vessels, as well an additional smaller lock for recreational boating.

A related side note: Our joint-venture firm, **Van den Herik Sliedrecht** and Nautilus Coastal-Solutions, both family-owned businesses from The Netherlands, is also exploring a possible solution for an even graver challenge: mitigating the gradual (and frightening) disappearance of the subsoil limestone-rocks underlying large parts of Florida due to the acidification of ocean waters.



SAN FRANCISCO BAY

We propose completely separating the tributaries and the waters of San Francisco Bay from the progressively rising waters of the Pacific Ocean by means of a nature-based sea dike, approximately 3.5 miles long, built immediately east of the Golden Gate Bridge. This dike will significantly shorten the current, approximately 400-mile-long shoreline along San Francisco Bay and will safeguard towns, communities, and businesses against sea-level rise and coastal flooding.

Within the boundary of the sea dike, inside the now-enclosed San Francisco Bay estuary, auxiliary dikes would need to be built, along with a water-level monitoring system, pumping stations and spillway and water inlet-structures, enabling full control of the Bay Area water table, including the control of algae growth. In addition, depending on specific site and shoreline conditions, other structures and services are necessary to protect buildings, infrastructures, transportation systems, sewage systems, and water-treatment plants, as well as protection of the inner bay wetlands and their crucial biodiversity. Two locks will also be included within the sea dike, a large one to facilitate ocean vessels serving the port, and a small lock for recreational boating. The sea dike and all other structures must be designed and built to be fully earthquake proof, up to at least 7.8 on the Richter scale.

Featured image: Jisp, The Netherlands. Photo by Frans Lemmens.

AUTHOR BIO



Jan H. de Jager is managing director of Nautilus Coastal-Solutions, based in The Netherlands. He has more than fifty years of experience designing and constructing dikes, bridges, jetties, pipelines and assorted other infrastructure projects. Currently, together with partner company Van de Herik Sliedrecht, he is involved with designing and building nature-based coastal-solutions to mitigate climate change and sea level rise.

‘©The Dutch Polder Solution™’

A Proposal & Method to mitigate Sea Level Rise,
threatening all Cities & Towns along the shores of San Francisco Bay



3 San Francisco Bay

7

1 The Golden Gate Sea-dike

8

4

6

5

6

9

2 Pacific Ocean

LEGEND

- 1 The Golden Gate Sea-Dike
- 2 Pacific Ocean
- 3 San Francisco Bay
- 4 Large lock for commercial seaships
- 5 Smaller lock for recreational boating
- 6 Pumping station
- 7 Spillway / Inletstructure
- 8 Control Tower
- 9 Service road



VAN DEN HERIK
SLIEDRECHT

Van den Herik Slidrecht

jointventure



Nautilus Coastal-Solutions

Scale: none

Date: September 2021

Proposal: Sealevel Rise, ... what to do?
to Bring ‘©The DUTCH POLDER Solution™’ to the
San Francisco Bay Area and guarantee renewed
SAFE Living & Working for all Coastal Citizens

Designer: ing. Jan H. de Jager, Heiloo / Slidrecht - The Netherlands

ESSAY

Sea Level Rise, what to do?

... proposal to bring ‘©The DUTCH POLDER Solution™’ to The USA,
guaranteeing renewed SAFE LIVING & Working for all Coastal Citizens



17th century: windmills pumping water from the Schermer Polder in The Netherlands



Afsluitdijk, completed in 1932, a 20 mile long Sea-Dike reducing the vulnerable shores of the IJsselriver estuary



Approx. 2035, an impression of the Sea-Dike, to establish 'The Dutch Polder Solution' for the San Francisco Bay Area

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VAN DEN HERIK
SLIEDRECHT

A joint venture


Nautilus
Nature Based Solutions for sustainable nature restoration and
residential developments with Gabions & Aqua-Flora® products
Nautilus Coastal-Solutions b.v.

ESSAY

Sea Level Rise, what to do?

... bring ‘©The DUTCH POLDER Solution™‘ to The USA, guaranteed resilient & sustainable SAFE LIVING for all Coastal Citizens

Government Agencies, planners, engineers and coastal citizens everywhere on Planet Earth are grappling with the immense challenges posed by climate change. These challenges are rising air- & water-temperatures, heat-waves, droughts, severe floods, wild forest fires, food scarcity, land subsidence & **Sea Level Rise**.

According to the latest IPCC Study, the UN-climate experts advises World Society to strive for the complete reduction of all Greenhouse Gas Emissions (GGE), to be by far the most effective way to prevent the climate from changing even faster and further running away.

Way back in **April 1782**, only six years after the **Declaration** of the 13 **united States of America**, **John Adams** arrived in Amsterdam as the first ambassador of the United States of America in the The Netherlands. Only three months after mr. Adam’s arrival a consortium of Netherlands Bankers provided a 5 million Dutch Guilder loan to the young republic, which would be **USD 150 Billion!** in today’s monies. An incredible amount and a sure sign of our country’s confidence in the young independant American Republic.

With the views and proposal presented in this **Essay** I am not proposing to provide an other large loan to the USA, but instead to cooperate and share with all US citizens our over 485 years old experiences & know how of safe living & working in below mean sealevel laying lands called **Polders***, situated in a major European Coastal Delta. (*Wikipedia, <https://en.wikipedia.org/wiki/Polder>).

Our proposal is particularly focused on designing a resilient & sustainable method to mitigate the threats to US-coastlands from sea level rise and in addition threats from storms, hurricanes, coastal-erosion and coastal-flooding. We objectively believe, in many locations US-coastal-living & -working is already in the dangerzone.

Reason why we do propose, as a resilient and manageable solution, to completely seperate coastal Metropolises (Cities, towns & estuaries) from direct contact and influences of the Oceans and thus make them fully independent from sea level rise and other waterlevel fluctuations, waves, storms & hurricanes.

The way to reach this goal is: ‘**The Dutch Polder Solution**’.

Certain Metropolitan City Agencies are considering stormsurge barriers and seawalls. But such structures are expensive, ‘CO2 bombs’ because of the heavy reliance on concrete as a building material, only limited effective for a few decades, often ugly to see and therefore not very sustainable, in particular when sea levels continue to rise. The Miami-Dade County commission for example rejected a \$ 4.6 billion proposal to install flood gates and 10’ high seawalls to protect downtown Miami-Dade. Instead they want Natural Solutions e.g. barrier islands & mangrove trees.

Other Cities did commence to raise main-roads, nourish their beaches with sea-sand, installing living shore-lines, recreate salt marshes & wetlands, oysterreefs, adaptive local flood protections and parks & open spaces for emergency flooding all with a view to contain the current sea level rise. These measures are certainly interesting and useful with an eye to adapting to climate change, but certainly not sufficient and bold enough to stay ahead of the disastrous consequences of continued sea level rise.

During 2018 the U.S. Global Change Research Program published their report called:

‘Fourth National Climate Assessment, Volume II, Impacts, Risks and Adaptation in the United States’.

This study established 3 years ago, that there are 49.4 million US-housing units in danger in shoreline counties.

In some dangerous coastal-locations US-councils did already decide to retreat away from coastal-living altogether. But in metropolitan coastal delta’s, where large numbers of citizens live & work, a decision to retreat away from the coast is very often politically next to impossible and/or socio-economic unrealistic, even on the recently introduced basis

This Essay and the accompanying 4 Annexes + 3 Illustrations does propose and present to the American people a proven & environmental sound alternative solution for resilient, safe, sustainable and affordable coastal living **for all citizens:**

‘©**The Dutch Polder Solution**™’, while ocean & sea levels continue to rise.

Within the boundaries of the Great European Rhine-, Meus- & Schelde Rivers Delta the majority of the people of The Netherlands have been living for over 485 years in lowlying **Polder lands**, including the inhabitants of our largest cities, such as e.g.: Amsterdam (our capital), Rotterdam (the third largest port in The World), The Hague (Government Seat), Utrecht & Haarlem.

Polders are large land- & water-area’s fully surrounded by dikes, whereby the ground-elevation is always situated below Mean Sea Level (MSL) and the watertable within the polder land is always controlled by man. For example approx. 50% of the overall land- & water-mass of The Netherlands is situated in Polders, ... always below MSL.

To be able to live & work safely in such a harsh environment specific infrastructures are required, like: sea- & river-dikes, drainage-canals, temporary water-storage basins, many pumps (windmills in the early centuries) and sufficient financing. The pre-financing of all such necessary infrastructure works in The Netherlands is primarily provided by our Central Government, but the inhabitants benefitting from these protective structures & services pay for it with a monthly waterboard fee. A fully integrated Public State-wide-water-management-Agency, a so-called Waterboard, is responsible for constructing, managing and maintaining all Polder-infra-structureworks, enabling our Countries Government to guarantee coastal-citizens dry feet year round.

We are available to host interested American delegations in The Netherlands to offer you the opportunity to acquaint yourself with all aspects of establishing a Polderwaterboard, the way these Public Organisations are managed in our lowlying country and to learn about all aspects of managing and maintaining polders in a sustainable and nature based way. According to the OECD the Dutch Watermanagement is considered to be the qualified global reference. The Netherlands is fully ready to share this wealth of experience, a true treasure trove, with all interested authorities from the USA*!

After we did become aware of the severe threats to citizens of coastal-lands in the USA we wish to suggest to Congress, Senate, Federal Government and all US-Coastal Agencies & -Citizens effected by the consequences of sea level rise, as a starter and convincer, to consider to built four ‘**Dutch Polder Solution**’ **pilot-projects**: 3 along the US-East-coast for example at Boston Bay–MA, Chesapeake Bay–V and Miami–FL & one along the US-West-coast for example at San Francisco Bay–CA, please see the Annexes 1 to 4 for details.

By constructing such Climate Transition polder-pilot-Projects every US-citizen can acquaint himself with the experience of resilient & sustainable living & working in US-coastal lands, safely situated inside ‘Dutch Polders’. Access to all existing harbors & ports, after completion of the proposed Polder-infra-structure-works, will be guaranteed with newly to be built sea-locks.

We assume, considering the speed of the progressing sea level rise and the slow pace of Worldwide efforts to reduce climate heating emissions, and in case no adequate and integrated protective coastal-infrastructures are built on time, e.g. within the next approx. 15 years, we expect major coastal US-metropolises will have to be abandoned altogether, simply because they will drown.

To prevent such incredible socio-economic disasters from happening, it is our sincere suggestion to Congress, Senate, Federal Government, State Governments & all US-Coastal Agencies to decide and implement BOLD actions and to draft new acts & laws, to be approved and adopted quickly, to establish a strong, fully integrated Federal coastal government organisation, inclusive of the Civil Works Department of the US Army Corps of Engineers, e.g. called: ‘*The Coastal-Security-Agency*’, staffed with adequate trained engineers & management, sufficiently financed for many decades to come.

Next the planning & design stage will have to start immediately and the execution of the works shortly after all plans have been completed and approved. Last but not least the antique ‘*Jones Act 1920*’ has to be abolished, because one cannot execute the daunting tasks ahead to protect the coastal US-homelands from disaster

and drowning with an over 100 years old, outdated act, restricting the ability to import and apply, for the benefit the best global coastal-engineering technologies and tools available.

Van den Herik Sliedrecht in jointventure with **Nautilus Coastal-Solutions**, both family owned and reputed civil engineering firms from The Netherlands: we are **Coastal-Master-Builders**. We are ready to bring ‘©The Dutch Polder Solution™’ to America, for the benefit, safety & well being of All US-coastal citizens & to make coastal-living & working a resilient, safe, affordable & a sustainable way of life again.

The ‘©**Dutch Polder Solution™**’ proposals described & illustrated in the enclosed renderings are aimed to vastly reduce coastal risks. For example we propose to shorten coastlines as a method to reduce the risk of coastal flooding and to stop progressing erosion, in particular in estuarine, Delta locations.

Our country The Netherlands has taken such bold and far reaching action before, e.g. we built and completed approx. 90 yrs. ago the 20 mile long (32 km.) so-called ‘*Afsluitdijk*’. A primary Sea-Dike closing and separating a large estuary, bordering our capital City of Amsterdam, from the North Sea, reducing the always dangerous and eroding coastline with approx. 340 km. (approx. 212 miles)!

To further highlight our professional ability & credibility we wish to inform you, that during the year 2020 our Jointventure participated in The World Bank – WACA ‘*Call for Innovation*’, to design ‘**Nature Based Solutions**’ to protect the coast and coastal citizens in six tropical countries in West Africa. Our Jointventure presented a design-proposal called: ‘*Coastal.Retrofit 2.0™, Nature Based Barrier Reef Solution*’, with a key role for the magic Mangrove tree.

Although our design did not win this worldwide contest, our proposal has been very much appreciated with the inclusion into The World Bank Group – WACA (WBG-WACA) ‘*Knowledge Product, Innovation Book*’. It is also presented on the WBG-WACA website as a sustainable & climate-proof infrastructure-solution for coastal protection & biodiversity restoration & protection**.

Concluding this Essay with suggestions to solve the very serious effects of sea level rise for US Coastal citizens in just four selected locations, we assume many other US-coastal Cities / Towns are also at risk. For example Cities located in low-laying Delta’s or Bays, like: New York Hudson Metropole, Houston–Galveston Bay Metropole, Tampa Bay Metropole, and probably many more cities and towns along the three US–coasts, no doubt will need sustainable & safe protections by designing & constructing: ‘The Dutch Polder Solution’. We are ready to commence with the protection of American Coastal-Lands!

Author: ing. Jan H. de Jager, Civil Engineer & MD.

*https://www.youtube.com/watch?v=RL9CMsrZRV4&list=PLAA8yVxqwatxHYnNHM2AC_NeBg9z7QIt1&index=4

** <https://storymaps.arcgis.com/stories/09a08140ebc947168ce9fa3ea63b05f0>

References:

McKinsey & Co., “C40 Cities – Focused adaptation”, How cities can adapt to climate change;
WACA- World Bank Group, Call for Innovation: ‘Coastal.Retrofit 2.0™’, Mangrove trees & man-made Barrier Reef in key role: Proposal from Van den Herik Sliedrecht & Nautilus Coastal-Solutions, The Netherlands;

World Bank Group-WAVES, Managing Coasts with Natural Solutions, coastal protection with Mangroves & Coral Reefs;

ANNEX

to
Essay

Sea Level Rise, what to do?

... bring ‘©The DUTCH POLDER Solution™’ to The USA,
guaranteed resilient & sustainable SAFE LIVING for all Coastal Citizens

Specific PROPOSAL & SOLUTION to demonstrate the viability for continued US-coastal living:
built a Pilot Project of ‘The Dutch Polder Solution’ at:

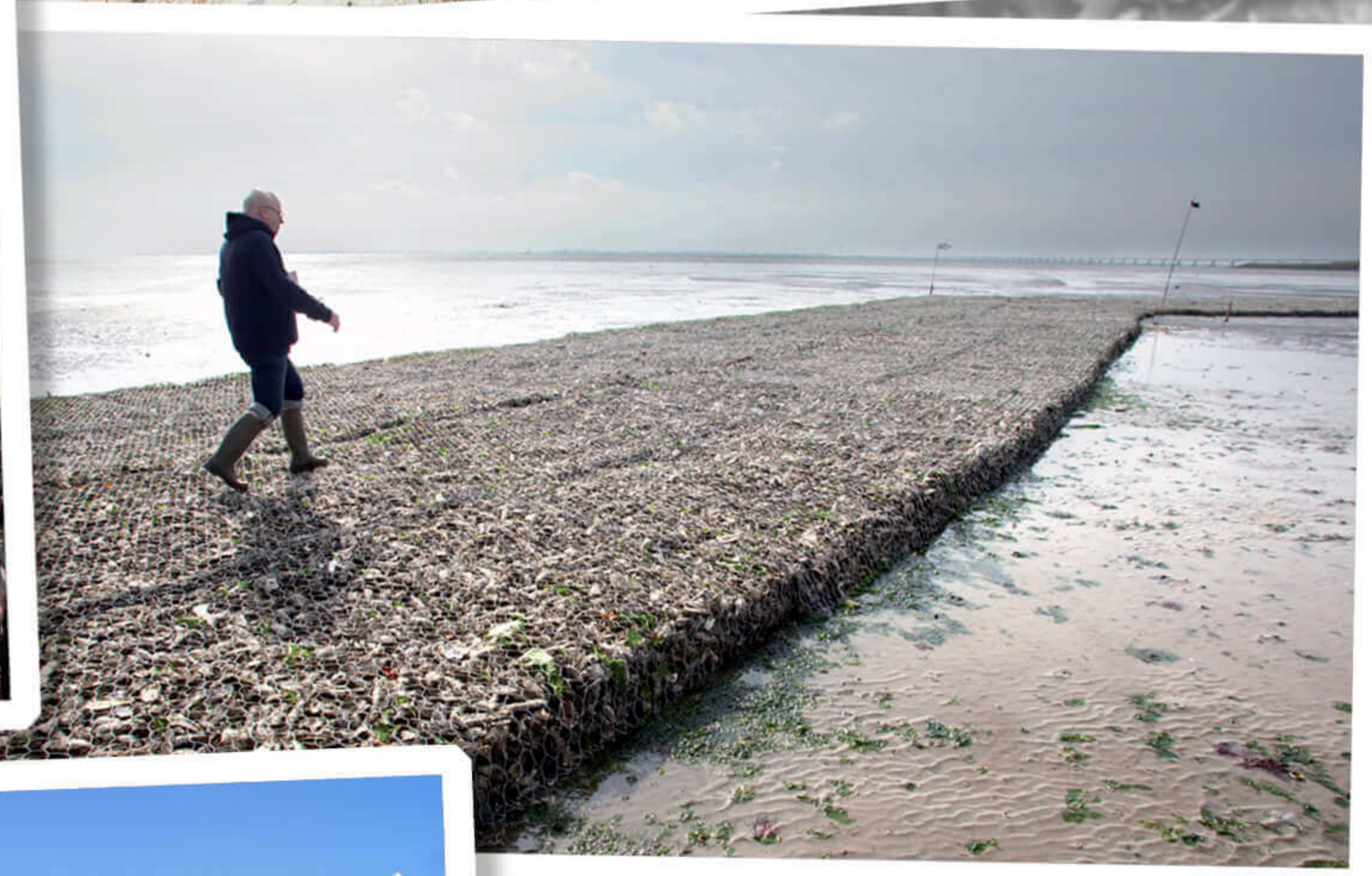
– **San Francisco Bay Metropole**, California, we propose to completely separate the tributaries and the waters of San Francisco Bay from the progressively rising waters of the Pacific Ocean by means of a ‘*fully climate-proof*’, ‘*wide-body*’ Nature Based, Sea-Dike, approx. 3,5 miles long, built immediately east of the Golden Gate Bridge. This Sea-Dike will significantly shorten the current approx. 400 mile long shoreline along San Francisco Bay and will so safeguard all bay towns and communities & businesses against sea level rise induced coastal flooding.

Inside the now enclosed San Francisco Bay estuary, within the boundry of the Sea-Dike, auxillary dikes need to be designed and built and also: pumping stations, spillway- / waterinlet-structures, enabling men full control of the watertable and waterquality, for example to control algae growth. In addition varied types of other structures are necessary to protect buildings, infrastructures, transportation systems, drinking watersupply, sewage system & watertreatment plants and to be able to save the important innerbay-wetlands & their biodiversity.

Also two locks will be included within the Sea-Dike, a large one to facilitate seaships to reach all ports situated along the San Francisco Bay-shores and a small lock for recreational boating. The Sea-Dike and all other structures must be designed and built fully earthquake proof up to 7.8 at the scale of Richter, pls. see the enclosed illustration.

To be able to successfully execute & complete the no doubt decade long design & construction phases of such a major San Francisco Bay Climate-Transition Project and after completion of all works, to be able to guarantee adequate maintenance and management, a dedicated new Government Agency is proposed, to include the Civil Works Department of the US Corps of Engineers, staffed with adequate trained engineers & management and sufficiently financed for many decades to come.

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The Dutch-Polder-Builders v.o.f.©
a joint venture

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ESSAY

Sea Level Rise, what to do?

... bring ‘©The DUTCH POLDER Solution™‘ to The USA, guaranteed resilient & sustainable SAFE LIVING for all Coastal Citizens

Government Agencies, planners, engineers and coastal citizens everywhere on Planet Earth are grappling with the immense challenges posed by climate change. These challenges are rising air- & water-temperatures, heat-waves, droughts, severe floods, wild forest fires, food scarcity, land subsidence & **Sea Level Rise**.

According to the latest IPCC Study, the UN-climate experts advises World Society to strive for the complete reduction of all Greenhouse Gas Emissions (GGE), to be by far the most effective way to prevent the climate from changing even faster and further running away.

Way back in **April 1782**, only six years after the **Declaration** of the 13 **united States of America**, **John Adams** arrived in Amsterdam as the first ambassador of the United States of America in the The Netherlands. Only three months after mr. Adam’s arrival a consortium of Netherlands Bankers provided a 5 million Dutch Guilder loan to the young republic, which would be **USD 150 Billion!** in today’s monies. An incredible amount and a sure sign of our country’s confidence in the young independant American Republic.

With the views and proposal presented in this **Essay** I am not proposing to provide an other large loan to the USA, but instead to cooperate and share with all US citizens our over 485 years old experiences & know how of safe living & working in below mean sealevel laying lands called **Polders***, situated in a major European Coastal Delta. (*Wikipedia, <https://en.wikipedia.org/wiki/Polder>).

Our proposal is particularly focused on designing a resilient & sustainable method to mitigate the threats to US-coastlands from sea level rise and in addition threats from storms, hurricanes, coastal-erosion and coastal-flooding. We objectively believe, in many locations US-coastal-living & -working is already in the dangerzone.

Reason why we do propose, as a resilient and manageable solution, to completely seperate coastal Metropolises (Cities, towns & estuaries) from direct contact and influences of the Oceans and thus make them fully independent from sea level rise and other waterlevel fluctuations, waves, storms & hurricanes.

The way to reach this goal is: ‘**The Dutch Polder Solution**’.

Certain Metropolitan City Agencies are considering stormsurge barriers and seawalls. But such structures are expensive, ‘CO2 bombs’ because of the heavy reliance on concrete as a building material, only limited effective for a few decades, often ugly to see and therefore not very sustainable, in particular when sea levels continue to rise. The Miami-Dade County commission for example rejected a \$ 4.6 billion proposal to install flood gates and 10’ high seawalls to protect downtown Miami-Dade. Instead they want Natural Solutions e.g. barrier islands & mangrove trees.

Other Cities did commence to raise main-roads, nourish their beaches with sea-sand, installing living shore-lines, recreate salt marshes & wetlands, oysterreefs, adaptive local flood protections and parks & open spaces for emergency flooding all with a view to contain the current sea level rise. These measures are certainly interesting and useful with an eye to adapting to climate change, but certainly not sufficient and bold enough to stay ahead of the disastrous consequences of continued sea level rise.

During 2018 the U.S. Global Change Research Program published their report called:

‘Fourth National Climate Assessment, Volume II, Impacts, Risks and Adaptation in the United States’.

This study established 3 years ago, that there are 49.4 million US-housing units in danger in shoreline counties.

In some dangerous coastal-locations US-councils did already decide to retreat away from coastal-living altogether. But in metropolitan coastal delta’s, where large numbers of citizens live & work, a decision to retreat away from the coast is very often politically next to impossible and/or socio-economic unrealistic, even on the recently introduced basis

This Essay and the accompanying 4 Annexes + 3 Illustrations does propose and present to the American people a proven & environmental sound alternative solution for resilient, safe, sustainable and affordable coastal living **for all citizens:**

‘©The Dutch Polder Solution™’, while ocean & sea levels continue to rise.

Within the boundaries of the Great European Rhine-, Meus- & Schelde Rivers Delta the majority of the people of The Netherlands have been living for over 485 years in lowlying **Polder lands**, including the inhabitants of our largest cities, such as e.g.: Amsterdam (our capital), Rotterdam (the third largest port in The World), The Hague (Government Seat), Utrecht & Haarlem.

Polders are large land- & water-area’s fully surrounded by dikes, whereby the ground-elevation is always situated below Mean Sea Level (MSL) and the watertable within the polder land is always controlled by man. For example approx. 50% of the overall land- & water-mass of The Netherlands is situated in Polders, ... always below MSL.

To be able to live & work safely in such a harsh environment specific infrastructures are required, like: sea- & river-dikes, drainage-canals, temporary water-storage basins, many pumps (windmills in the early centuries) and sufficient financing. The pre-financing of all such necessary infrastructure works in The Netherlands is primarily provided by our Central Government, but the inhabitants benefitting from these protective structures & services pay for it with a monthly waterboard fee. A fully integrated Public State-wide-water-management-Agency, a so-called Waterboard, is responsible for constructing, managing and maintaining all Polder-infra-structureworks, enabling our Countries Government to guarantee coastal-citizens dry feet year round.

We are available to host interested American delegations in The Netherlands to offer you the opportunity to acquaint yourself with all aspects of establishing a Polderwaterboard, the way these Public Organisations are managed in our lowlying country and to learn about all aspects of managing and maintaining polders in a sustainable and nature based way. According to the OECD the Dutch Watermanagement is considered to be the qualified global reference. The Netherlands is fully ready to share this wealth of experience, a true treasure trove, with all interested authorities from the USA*!

After we did become aware of the severe threats to citizens of coastal-lands in the USA we wish to suggest to Congress, Senate, Federal Government and all US-Coastal Agencies & -Citizens effected by the consequences of sea level rise, as a starter and convincer, to consider to built four ‘**Dutch Polder Solution**’ **pilot-projects:** 3 along the US-East-coast for example at Boston Bay–MA, Chesapeake Bay–V and Miami–FL & one along the US-West-coast for example at San Francisco Bay–CA, please see the Annexes 1 to 4 for details.

By constructing such Climate Transition polder-pilot-Projects every US-citizen can acquaint himself with the experience of resilient & sustainable living & working in US-coastal lands, safely situated inside ‘Dutch Polders’. Access to all existing harbors & ports, after completion of the proposed Polder-infra-structure-works, will be guaranteed with newly to be built sea-locks.

We assume, considering the speed of the progressing sea level rise and the slow pace of Worldwide efforts to reduce climate heating emissions, and in case no adequate and integrated protective coastal-infrastructures are built on time, e.g. within the next approx. 15 years, we expect major coastal US-metropolises will have to be abandoned altogether, simply because they will drown.

To prevent such incredible socio-economic disasters from happening, it is our sincere suggestion to Congress, Senate, Federal Government, State Governments & all US-Coastal Agencies to decide and implement BOLD actions and to draft new acts & laws, to be approved and adopted quickly, to establish a strong, fully integrated Federal coastal government organisation, inclusive of the Civil Works Department of the US Army Corps of Engineers, e.g. called: ‘*The Coastal-Security-Agency*’, staffed with adequate trained engineers & management, sufficiently financed for many decades to come.

Next the planning & design stage will have to start immediately and the execution of the works shortly after all plans have been completed and approved. Last but not least the antique ‘*Jones Act 1920*’ has to be abolished, because one cannot execute the daunting tasks ahead to protect the coastal US-homelands from disaster

and drowning with an over 100 years old, outdated act, restricting the ability to import and apply, for the benefit the best global coastal-engineering technologies and tools available.

Van den Herik Sliedrecht in jointventure with **Nautilus Coastal-Solutions**, both family owned and reputed civil engineering firms from The Netherlands: we are **Coastal-Master-Builders**. We are ready to bring ‘©The Dutch Polder Solution™’ to America, for the benefit, safety & well being of All US-coastal citizens & to make coastal-living & working a resilient, safe, affordable & a sustainable way of life again.

The ‘©**Dutch Polder Solution™**’ proposals described & illustrated in the enclosed renderings are aimed to vastly reduce coastal risks. For example we propose to shorten coastlines as a method to reduce the risk of coastal flooding and to stop progressing erosion, in particular in estuarine, Delta locations.

Our country The Netherlands has taken such bold and far reaching action before, e.g. we built and completed approx. 90 yrs. ago the 20 mile long (32 km.) so-called ‘*Afsluitdijk*’. A primary Sea-Dike closing and separating a large estuary, bordering our capital City of Amsterdam, from the North Sea, reducing the always dangerous and eroding coastline with approx. 340 km. (approx. 212 miles)!

To further highlight our professional ability & credibility we wish to inform you, that during the year 2020 our Jointventure participated in The World Bank – WACA ‘*Call for Innovation*’, to design ‘**Nature Based Solutions**’ to protect the coast and coastal citizens in six tropical countries in West Africa. Our Jointventure presented a design-proposal called: ‘*Coastal.Retrofit 2.0™, Nature Based Barrier Reef Solution*’, with a key role for the magic Mangrove tree.

Although our design did not win this worldwide contest, our proposal has been very much appreciated with the inclusion into The World Bank Group – WACA (WBG-WACA) ‘*Knowledge Product, Innovation Book*’. It is also presented on the WBG-WACA website as a sustainable & climate-proof infrastructure-solution for coastal protection & biodiversity restoration & protection**.

Concluding this Essay with suggestions to solve the very serious effects of sea level rise for US Coastal citizens in just four selected locations, we assume many other US-coastal Cities / Towns are also at risk. For example Cities located in low-laying Delta’s or Bays, like: New York Hudson Metropole, Houston–Galveston Bay Metropole, Tampa Bay Metropole, and probably many more cities and towns along the three US–coasts, no doubt will need sustainable & safe protections by designing & constructing: ‘The Dutch Polder Solution’. We are ready to commence with the protection of American Coastal-Lands!

Author: ing. Jan H. de Jager, Civil Engineer & MD.

*https://www.youtube.com/watch?v=RL9CMsrZRV4&list=PLAA8yVxqwatxHYnNHM2AC_NeBg9z7QIt1&index=4

** <https://storymaps.arcgis.com/stories/09a08140ebc947168ce9fa3ea63b05f0>

References:

McKinsey & Co., “C40 Cities – Focused adaptation”, How cities can adapt to climate change;
WACA- World Bank Group, Call for Innovation: ‘Coastal.Retrofit 2.0™’, Mangrove trees & man-made Barrier Reef in key role: Proposal from Van den Herik Sliedrecht & Nautilus Coastal-Solutions, The Netherlands;

World Bank Group-WAVES, Managing Coasts with Natural Solutions, coastal protection with Mangroves & Coral Reefs;

ANNEX

to
Essay

Sea Level Rise, what to do?

... bring ‘©The DUTCH POLDER Solution™’ to The USA,
guaranteed resilient & sustainable SAFE LIVING for all Coastal Citizens

Specific PROPOSAL & SOLUTION to demonstrate the viability for continued US-coastal living:
built a Pilot Project of ‘The Dutch Polder Solution’ at:

– **San Francisco Bay Metropole**, California, we propose to completely separate the tributaries and the waters of San Francisco Bay from the progressively rising waters of the Pacific Ocean by means of a ‘fully climate-proof’, ‘wide-body’ Nature Based, Sea-Dike, approx. 3,5 miles long, built immediately east of the Golden Gate Bridge. This Sea-Dike will significantly shorten the current approx. 400 mile long shoreline along San Francisco Bay and will so safeguard all bay towns and communities & businesses against sea level rise induced coastal flooding.

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From: [Jan de Jager \(Nautilus Coastal-Solutions b.v.\)](#)
To: [BCDC PublicComment](#)
Cc: [Jan Huijbers](#); [Perrin-Martinez, Jaclyn@BCDC](#)
Subject: RSAP, Public Comment - Email 2 of 2, SFBay Adapt: from The Dutch Polder Builders in The Netherlands.
Date: Thursday, October 17, 2024 1:41:19 AM
Attachments: US Coastal Metropoles. The-Dutch-Polder-Solution - General Design Concept.pdf
2010 - The remarkable history of "The Dutch Polder System".pdf
[Open the email Herik & Nautilus Coastal-Solutions knnie.png](#)

Some people who received this message don't often get email from nautilus.coastal.solutions@gmail.com. [Learn why this is important](#)

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Email 2 of 2, SFBay Adapt: Regional Shoreline Adaption Plan:

(Earlier, on October 11, 2024 already send to mrs. Jaclyn Perrin-Martinez):

SUBJECT: RSAP, Public Comment:

From:

Van den Herik Sliedrecht in JV with Nautilus Coastal Solutions,
both private companies from The Netherlands,

To:

San Francisco Bay Conservation and Development Commission,
375 Beale Street,
Suite 510,
San Francisco, 94105.

Dear Members of the BCD Commission,

Enclosed: for your RSAP team's additional information, our **email 2 of 2**:

We are available to answer your questions.

Many regards,
Ing. Jan H. de Jager, managing director.



jointventure



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3361 HJ Sliedrecht - The Netherlands

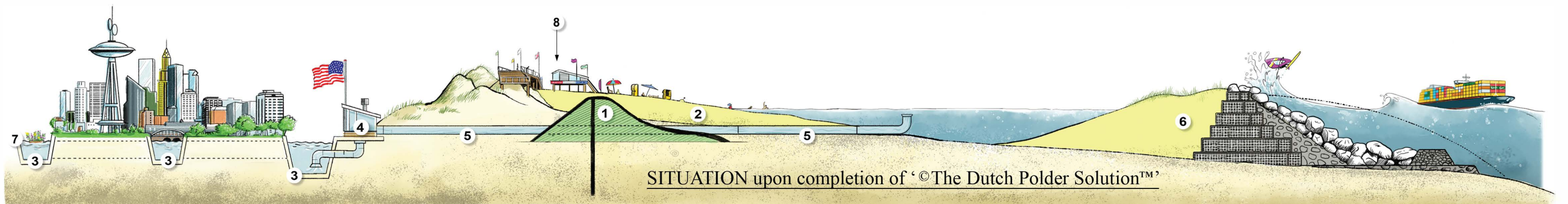
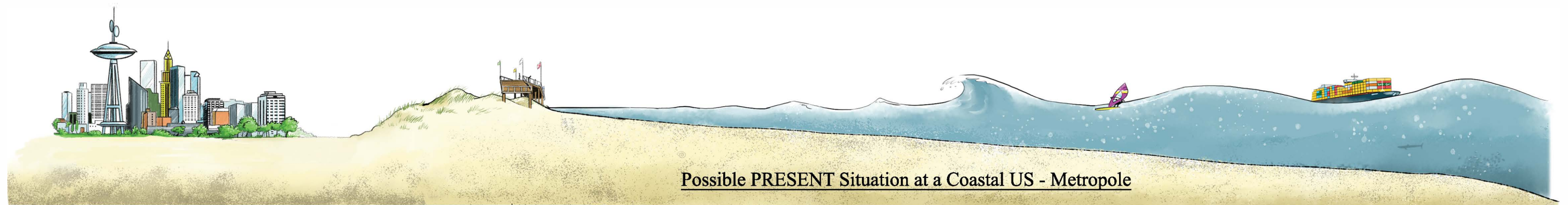
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A Nature Based Proposal & method to mitigate seal level rise, threatening US - Metropolises and other low-laying coastal communities.

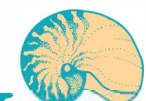


LEGEND

- 1) Newly built, ‘hidden’, Sea-Dike incl. groutcurtain.
- 2) Nourished beaches & raising the dune height with sand borrowed from the seafloor.
- 3) Digging & building city-drainage canals and temporary water-storage-ponds.
- 4) Building sufficient polder-water-pumping stations.
- 5) Water discharge pipe.
- 6) Newly built Barrier Islands.
- 7) Aqua-Flora® Eco-Floatlands for watertreatment & city-beautification.
- 8) Not shown, but access to the existing harbour after completion of the Polder Solution works, will be achieved via newly built sea-locks.



VAN DEN HERIK
SLIEDRECHT



Nautilus

Van den Herik Sliedrecht & Nautilus Coastal-Solutions

Scale: none

Date: August 2021

Proposal: Sealevel Rise, ... what to do?
... Bring ‘©The DUTCH POLDER Solution™’ to The USA,
to guarantee renewed SAFE Living for all Coastal Citizens

Designer: ing. Jan H. de Jager, Heiloo / Sliedrecht - The Netherlands

The remarkable history of polder systems in The Netherlands^{1 2}

Summary

The traditional polders in The Netherlands have been formed from the 12th century onwards, when people started creating arable land by draining delta swamps into nearby rivers. In the process, the drained peat started oxidizing, thus soil levels lowered, up to river water levels and lower. Throughout the centuries farmers have been adapting their agricultural system to lowering soil levels and occasional floods and invented new ways to organise themselves and keep sea and river water out – resulting in the building of hundreds of drainage windmills and later pumping stations to pump water from polders into the rivers and the sea.

This development resulted in the creation of present-day polder landscapes that are characterised by grasslands on peaty soil with drainage channels, economically sustained by dairy farming, which harbour a rich flora and fauna. These systems function in a context of (among others) rising sea and river levels, continued lowering land levels, increasingly multi-functional use of land (urbanisation, recreation and tourism, nature conservation, culture conservation), interference of agricultural policies, and other interests. A plethora of government, non-government and private parties with intense negotiation practice make up the polder governance arena. The oldest of such organisations are the “water boards” with the mandate to provide safety from water threats for all citizens. The physical and institutional polder culture is indeed a crucial aspect of the Dutch national identity.

1 Introduction

Delta geology The Netherlands is a state in the deltas of three European rivers. The biggest river is the Rhine, which flows from the northern Alps through western Germany right through The Netherlands (Figure 1). The Meuse flows from France through Belgium through the south of the country, and the largely Belgian Schelde shaped an area in the south-west of the country. Geologically, this area is shaped by sand banks put up by the interference of water streams from these rivers, and the north-east bound current of the North Sea. After the last ice age, twelve thousand years ago, both at the river sides and at the north sea coast, there were long-shaped stretches of sandy banks. Such banks allowed for human settlement in the years 600-1200 that form the historical centres of present-day towns. Only after World War-II, present-day outskirts were built, often in the areas with peat (or heavy clay) soils.

¹ This paper was prepared on request of Dr Parviz Koohafkan, Director, Land and Water Division and Coordinator of the Globally Important Agricultural Heritage Systems (GIAHS) Initiative, FAO, Rome. Its objective is to document a potential GIAHS system that featured coping strategies for rising sea water levels in the context of climate change. The paper was also presented during the International Consultation on “Agricultural Heritage Systems of the 21st Century” that was hosted by the M S Swaminathan Research Foundation on 18 February 2010 in Chennai, India.

² Paper written by Frank van Schoubroeck, Ph.D., consultant, policy-practice linkages in small-scale farming, frankvanschoubroeck@yahoo.com; and Harm Kool, MSc., Waterschap Rivierenland, Tiel, The Netherlands

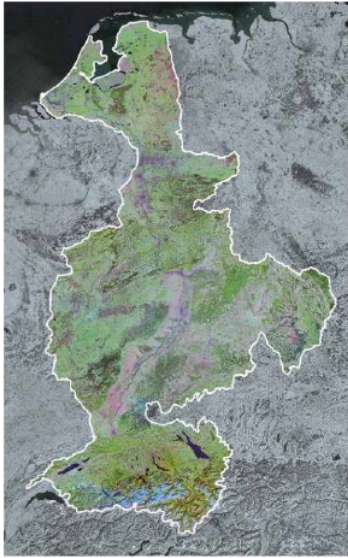


Figure 1. The Rhine catchment area with the delta in the north-west.



Figure 2. An area with traditional polders (red, dotted circle) and area with modern polders (yellow circle).

Modern polders The state of The Netherlands has a long history of creating “polders” - sub-sea level (or sub-river level) land, that is protected – or even reclaimed - from the sea. In the mid-20th century the state commissioned the realisation of polders in the then “Southern Sea” (Zuiderzee) that with the construction of dykes now is a lake (called IJsselmeer). The then Zuiderzee was and is in the centre of the country (yellow circle, Figure 2) and the Government indeed reclaimed land from the (shallow) sea. It was the Dutch State who carried out this land reclamation and created a modern agricultural landscape, with occasional modern towns that were built after the 1960s.

Traditional polders Besides these large-scale modern polders, there are polders that have been created in the course of history and that may be one to a few hundred years old. The so-called “Green Heart of Holland” (red, dotted circle) is situated between the cities of Rotterdam, The Hague, Amsterdam and Utrecht consists of different polders. These polders are not exactly land reclamations, they are rather conserved areas – as they have not been reclaimed from the sea but rather protected from the sea.



Figure 3. In the 1990s river levels reached dangerous heights, sparking off a new policy with regards to river management.

River threats Both water from the river catchment areas and water from the sea threaten large parts of The Netherlands. Over the last century, river catchment areas both in Germany and in The Netherlands improved drainage systems both in cities and in rural areas. Therefore, during wet periods in the catchment area, rivers get a more irregular water regime, challenging the dykes along the river. After a couple of near-floods in densely populated areas in the early 1990s (Figure 3), The Netherlands decided to deepen the river and widen the areas fit for flooding. This project is called “Room for the River” and allows for more traditional nature and agriculture in a wide band along the rivers in the middle of the country.



Figure 4. River and sea levels are strongly related up to a hundred kilometers from the coast. Accompanying polder landscapes have been formed as part of the river landscape.

Sea threats The sea poses a more structural threat. As the rivers only go down by a few meters over an area of 100 km, the tides are being felt up to almost a hundred km inside the country. With global warming, both polar ice melts and sea water expands, resulting in a steady rise of the sea. This has serious implications for all areas close to the rivers, because a higher sea level also means that river levels get higher – and that areas so far inhabitable might flood, or that water will seep through the dykes into the lower-lying land.

The question is: to what extent is a rising water table a new development? How have the Dutch coped with water in the course of history? As an illustration we look into the history of the Alblasserwaard, one of the traditional polders 25 km east of Rotterdam, along one of the Rhine arms called de Lek.

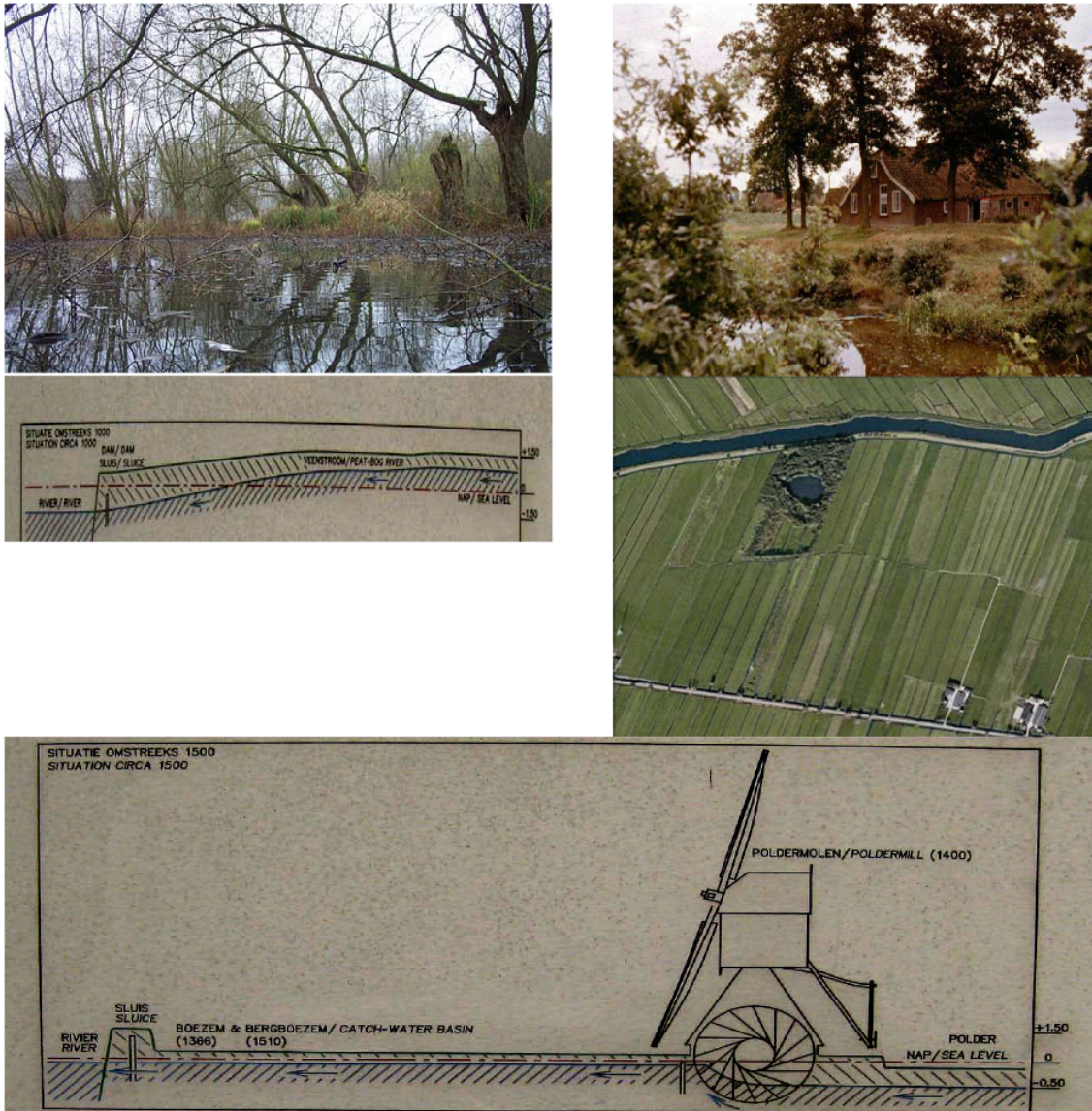


Figure 5. In the Alblasserwaard, as in many traditional polders, swampy areas were drained to create arable land from the 12th century onwards.

1000 years ago In the 10th-11th century the now Alblasserwaard area was swampy (Figure 5). In the course of geological times (after the last ice age) peat had built up in-between the sandy banks along the river. In the 12th century, people started draining the area. As the peat was above the river and sea level, this was a relatively easy job: they could dig drainage canals to the nearby river that led to the sea. At that time, the seawater level was a few decimetres lower than now. So, when people settled in the swampy areas, both the land was higher, and the sea was lower than nowadays.

Draining the swamps People drained water from the swamps into the river. In this period, farmers shaped the structure of the landscape: a complicated set of canals – from small drains to larger canals. This allowed farmers to grow crops. The canal – stream structure of the land can be seen until today.

Pumping needed The soil in the area was (and is) made up of peat. Due to grazing and drainage, the peat growing process was halted – while peat oxidizes when directly in contact with air. This resulted in gradual lowering of the soil level, to an extent that after a few hundred

years, the soil had lowered to approximately the level of the river. Thus, natural drainage did not suffice anymore to keep the area clean of water, and people needed to start pumping. Originally pumping was done by human power, but as this appeared not sufficient, farmers developed wind-driven pumping systems. The original structure of canals was still used to drain, but the water was pumped out at the end of the channel.

Dyke building At the same time, people needed to build minor dykes to keep the tidal river water out. Originally these dykes were built by individual farmers or small communities. However, if your neighbour's dyke burst, your land flooded as well, so some form of co-ordination was needed to keep water out. In some areas, such co-ordination failed, and the water took over the land. In other areas, farmers organised in local "water boards" that set down rules to responsibilities, and fines were imposed in case of failure. In the Alblasserwaard, already in the 12th century, Count Floris the Fifth ordered the organisation for building of a ring-dyke all-round the Alblasserwaard, to be managed by different water boards. The result was the establishment of a "polder": land that is protected from surrounding water levels that are higher than the land surface.

Land levels lowered In the following centuries, the process of soil lowering continued. Dairy farming is more water-tolerant than crop cultures and surplus labour moved from the swampy areas to nearby towns, where people started trading for a living. After some floods in the 18th century, people realised that the system did not suffice to keep the water out. The water table had become below one meter of the lowest river levels and it was difficult to keep the land dry enough for production and safety. As a consequence, an extra step of pumping was needed to keep the polder dry. Near the town of Kinderdijk, at the western-most point of the Alblasserwaard, people built a complex of 19 windmills to pump the water out.

The windmills have been functioning for about a hundred years. In the mid-19th century, extra mechanical pumping power was installed, but the windmills remained in function. During World War II, when the country ran out of fuel, the windmills were the only pumping system to save the Alblasserwaard from flooding. Soon after the war another pumping station was installed, and the windmills have gone out of function. The Kinderdijk windmills are now a World Heritage Site. In many other places, drainage mills were broken down, but at the same time, many windmills have been saved as a local monument, for touristic purpose.

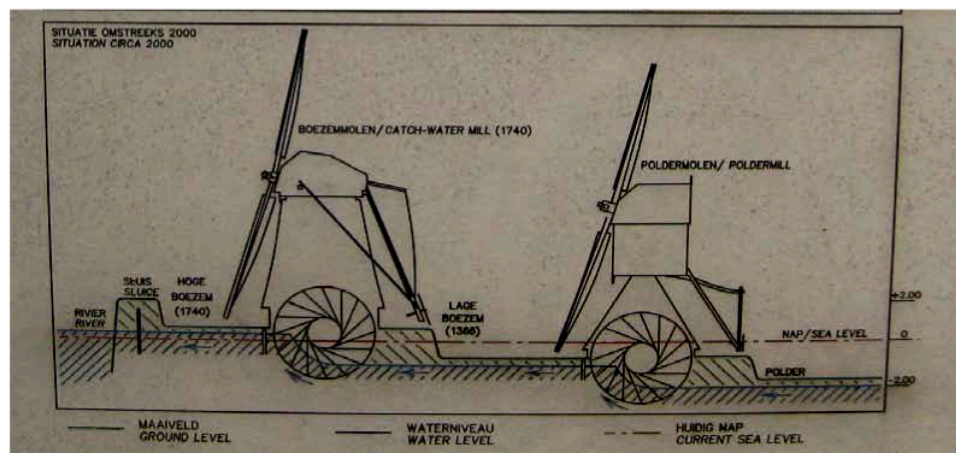




Figure 6. The water management system consists of many interlinked elements that need continuous maintenance.

Water discharge system The drainage of the Alblasserwaard is based on the systems that have been developed from the 12th to the 18th century. Numbers in the figure show where different activities take place. Figure 6 shows only the lowest part of the Alblasserwaard polder. (1) Water is drained from fields and pumped into (2) a canal. (3) is the place where lines of 19 windmills used to pump water into the (4) reservoirs. (5) during low tide the water is discharged in the river Lek that (6) takes it to the sea.



Figure 7. Many windmills built in the 18th century have been preserved, such as this impressive line of mills at Kinderdijk, which is a UNESCO World Heritage Site. Technology of such windmills is intriguing; the whole top can be turned following the wind direction.

Windmill-pumps Windmills have been around in The Netherlands since the 15th century. The windmill-technology is complicated and robust. For example, the miller can turn the blades with a span of 20 m towards the direction of the wind (Figure 7). The (white) wheel to the front was used to turn the entire upper part of the mill; while the wheel to the back was the pump to bring water up for about 1.5 m from the right to the left. The windmill therefore must be flexible as well as extremely strong, to stand the occasional storms.

About 1100 windmills in The Netherlands have been preserved with support of Government or private initiative. Many of them are used and they can be visited for touristic purpose.

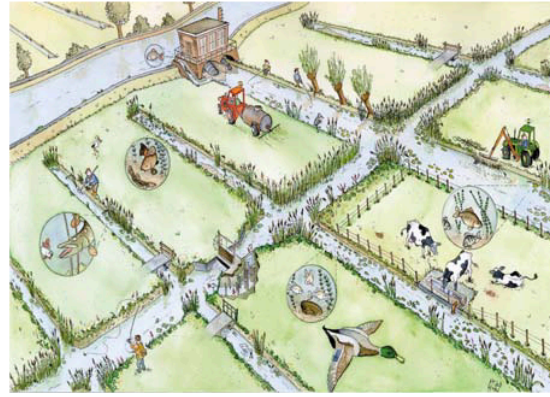


Figure 8. Traditional polder structures such as drainage channels and water ways still make up much of the polder landscape.

Water table tug-of-war Water management in the polder is the result of weighing many different interests. Lower water tables are good for production of grass and therefore for the farm economy on the short term. With cutting-throat economic conditions, farmers are often forced to go into short-term benefits. But lower water tables also cause oxidation of peat, and gradual lowering of the soil surface. The result is an on-going lowering of the soil level, at present between 10 and 50 cm a century – which in the very long run will result in difficulties to keep sea and river water out. Higher water tables both keep soil lowering to a minimum, and are good for biodiversity, as most wild field-species are water-loving. Thus, the optimum water table is a result of different and opposite interests.

Water boards The above mentioned technical development was made possible through a parallel process of institutional development. In 13th to 16th century, farmers created polders by organising themselves. To begin with, a few households co-operated to jointly protect their fields, but later, the scale of organisation went up, and communities formed “water boards” that were a council of most influential farmers who joined hands to build and maintain provisional dykes. Later, more complicated and ever-evolving drainage systems were put in place like the one in the Alblasserwaard, starting from the 1200s. The water boards are in fact a “traditional” – you can say “tribal” form of governance. The water board system of governance developed largely independent from the development of cities, provinces and the state that occurred from the 14th to the 19th century. Water boards are a unique feature in Dutch society and the oldest form of governance in the country. They are the institutions that weigh all interests and regulate the water table accordingly. Historically, locally organised water boards have been merging into larger ones, which is an on-going process. In 2010, The Netherlands is divided into 21 water boards (Figure 9) – that have very different borders than the political subdivision in provinces and towns, as water boards are often defined by watersheds or islands.

The present-day political discussion focuses on the idea to do away with the water boards, and bring them under the provincial governments (of which there are 12).

Water boards still stand at the base of the Dutch tradition of consensus politics, where decision-making bodies talk long until an agreement is forged. This kind of politics dominated the political culture until the 20th century. Possibly, the emergence of the internet is challenging this culture of consensus politics.



Figure 9. Water boards form a separate administrative layer in the Netherlands' governance system. Their borders are determined by watersheds; not so much by political entities.

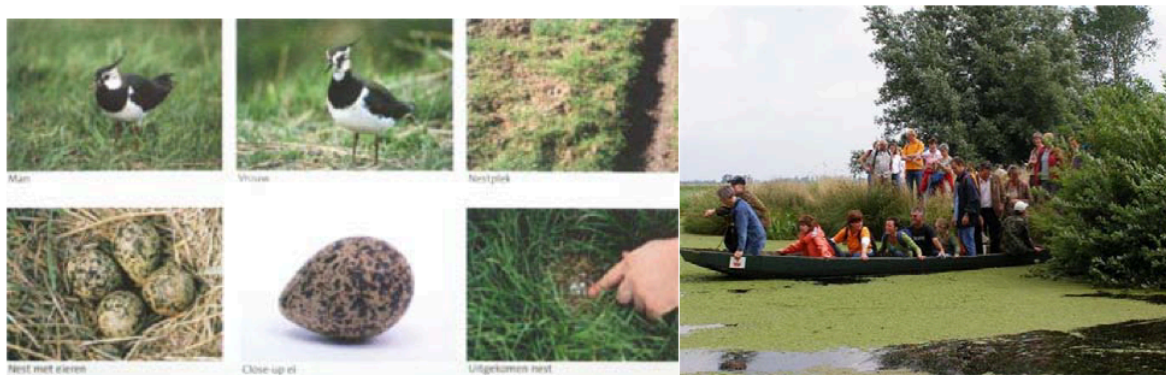


Figure 10. Polder landscapes harbour a unique ecosystem. Citizens both from the rural area and nearby towns and cities, and also farmers, pick up bird watching and botanical knowledge as a hobby.

Flora and fauna The polder system has a characteristic flora and fauna. A particular category of “field birds” include various kinds of ducks, waders (*Charadriiformes*) such as the Northern Lapwing (*Vanellus vanellus*), Eurasian Oystercatcher (*Haematopus ostralegus*), Black-tailed Godwit (*Limosa limosa*), Common Redshank *Tringa tetanus*, Grey Heron (*Ardea cinerea*). These birds flourish in places with shallow, slowly moving water, with fish and insects. A variety of songbirds lives in or nearby grassy fields, such as Larks (*Alaudidae*), meadow pipit (*Anthus pratensis*), Yellow Wagtail, (*Motacilla flava*), and many others. The polders harbour a wide variety of grass species and plants that grow in swampy areas and shallow water. Some tree species are resistant to water logging, such as certain types of willows. One willow species used to be cut every few years and formed typical crowns of branches (“knotwilg”) and these branches were used for all sorts of activities, among which the building of a kind of mats that was used for the construction of dykes.

Society perceives farming In the 1970s, besides high productivity, the green Revolution had brought pollution and reduction of biodiversity. Nature organisations started protesting such farm practices and in some areas, they bought quite some farm land to establish nature reserves. While managing these reserves, they realised that farming was an essential activity to conserve the typical field biotope. After the 1970s, a new generation of farmers sought to marry productivity and nature conservation goals. In some nature reserves, restricted farming takes

place, exactly to preserve the particular farm-induced biotopes. But also in mainstream farming areas, nature organisations and farmers are now co-operating. For example, farmers get rewarded for the number of birds' nests in their fields, leaving the management regime to farmers while still adhering to nature conservation objectives. In quite a few areas farmers established nature clubs, who seasonally take nearby citizens into their grasslands, showing how they manage to produce as well as maintain the number and variety of birds.



Figure 11. Farm houses are mostly built on natural or artificial sand banks in the polder landscape. Municipalities often have policies in place to maintain traditional buildings by giving it new functions; even if at time modern buildings are constructed in-between.

Farm houses Traditionally, farms were built on the occasional sandy banks that occurred here and there in the polder. Houses were built so, that in case of high water, cows could be safely put on a second floor. Many such farms are still in place, even if the interior is often overhauled every new generation, to keep fulfilling the needs of the day. Therefore, even today you can see inhabited old farmhouses – sometimes by a farming family, but also by other citizens, who enjoy the traditional beauty of the house.



Figure 12. Modern dairy industry is built on traditional technology and institutions, such as the co-operative dairy factory.

Diary industry Due to the steady outflow of people from rural into urban areas, urban centres such as Schiedam, Rotterdam and Dordrecht provided a good market for milk products from the Alblasserwaard. Thus, from the 15th century onwards, farmers produced milk for the market. Market-oriented production has some intriguing features. Cows produce irregularly, and milk had to travel 20-50 km, which at the time took a day or so. Farmers thus needed ways to preserve excess milk. It must have cost a lot of experimentation to figure out that rennet from the cow's stomach was helpful to take out the solid parts of the milk, and prepare cheese. This traditional method is still the basic process of present-day cheese making. The process was

invented on individual farms, and around 1890, the first co-operatives took over milk processing and production of all sorts of cheese. Such co-operative factories have developed into a flourishing dairy sector that exports about 60% of its produce with an annual turnover of around €600 m. Even today, these factories have a co-operative structure of governance.



Figure 13. In every town in The Netherlands there are stalls that sell many different kinds of Dutch cheese, which is part and parcel of the diet of every Dutch household.

“Dynamic conservation” of traditional food Holland is famous for its wooden shoes, but besides tourist attractions, you would rarely find a citizen or a farmer use them nowadays. The situation is very different for traditional cheese. Cheese manufacturing in The Netherlands represents a rich and developing food culture. Every town has a weekly market with cheese stalls; an each stall has its particular collection of cheeses. Supermarkets easily sell a hundred different kinds of cheese and other milk products. Every year, new kinds of cheese are developed that take over segments in the market. A recent addition for example is the spread of goat cheese as a regular feature in Dutch households. Some 300 wholesalers (cheese, butter and powder) and 6,000 sales outlets are involved in the trade in and sales of dairy products. The dairy sector as a whole provides around 62 thousand jobs, and the money consumers spend on cheese in fact help maintaining the polder landscape in the Alblasserwaard.

The future of the polder system There is a series of developments that determine the future of the polder agricultural system.

Lowering of soil as well as rising of the sea level pose an ever-growing threat to the polders. The polder soil is unstable, and the country has to do large investments to keep the area inhabitable. But, at the same time, most polders are in the wealthiest parts of The Netherlands, and it is likely that society will keep being able to sustain maintenance of the complicated water system. There are visions for a big sea-dyke along the coast, which will protect the country integrally. Such a structure would be unique, as even river water from the big rivers the Rhine and Maas would have to be pumped out.

Increasing influence of Europe is a driver for change. For example, subsidies to production have changed the farming system towards high-input and market-driven. When subsidies were diminished gradually and production quotas were put in place, many farmers went bankrupt, and neighbour farms took land – now the average farm size is around 40 ha with 55 cows. European agricultural policy is thus directly influencing developments in the polder dairy sector.

Diversification of economic activities to realise multi-functional agriculture is the strategy to maintain the polder landscape. There are experiments with the creation of regional products, tourism, care farming, etc – to make farming more lucrative. Farmers get additional income from maintaining landscape elements such as the pruned willow, or the number of birds nests

in their land. Such efforts get nice publicity, but dairy farming remains the economic stronghold of the area: more than 90% of economic activity relies on dairy production.

National identity Yet, diversifying economic activities have more than economic significance. It also signifies that society and farming are again at speaking terms, that citizens and farmers work together to preserve the unique system, that underpins the Dutch national identity as much as other flagships such as international trade. All schoolchildren in The Netherlands learn about the polder system, the dairy industry, and the associated culture and identity. The polder system is there to stay, even if it is ever-changing, responding to new developments in society as well as in the world as a whole.

Acknowledgements This article was put together with inputs from various Water Boards, information from farmers' organisations such as the Dutch Agriculture and Horticulture Organisation, local farmers' organisations, nature organisations, the Province of Zuid-Holland, the Kinderdijk Foundation, UNESCO, Google Earth, as well as individuals such as Katrien van 't Hooft and Paul van der Aa, as well as the school curriculum of the Jan Ligthart School in Veldhoven in the 1970s. We want to express many thanks to Dr M.S. Swaminathan and Dr Parviz Koohafkhan for recognising the ingenuity and relevance of the Dutch polder system.

COMMENT #217

PDF – Transportation Authority of Marin



October 16, 2024

San Francisco Bay Conservation and Development Commission
375 Beale Street
San Francisco, CA 94105

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Urban Carmel

Novato
Rachel Farac

Ross
Teri Dowling

San Anselmo
Brian Colbert

San Rafael
Kate Colin

Sausalito
Melissa Blaustein

Tiburon
Alice Fredericks

County of Marin
Mary Sackett
Katie Rice
Stephanie Moulton-Peters
Dennis Rodoni
Eric Lucan

Subject: 10/17/24 Item 8: Bay Plan Amendment No. 1-24 to Adopt a Regional Shoreline Adaptation Plan and Establish Guidelines for the Preparation of Sea Level Rise Plans Pursuant to Senate Bill 272 (Laird, 2023)

To Whom It May Concern,

The Transportation Authority of Marin (TAM) is submitting public comment for the Bay Plan Amendment No. 1-24 to Adopt a Regional Shoreline Adaptation Plan and Establish Guidelines for the Preparation of Sea Level Rise Plans Pursuant to Senate Bill 272 (Laird, 2023). TAM is currently in the process of developing a study analyzing Sea Level Rise Adaptation Planning for Marin County's Transportation System. The study includes an Existing Plan Review, Vulnerable Locations Memo, Adaptation Summaries, a Governance Review, and Implementation Plan. TAM has dedicated \$550,000 and 2 years' worth of work and meetings with many of the local, regional, and state partners to draft a comprehensive and collaborative study. We would like our study to help the local jurisdictions meet as many requirements as possible for BCDC's Regional Shoreline Adaptation Plan guidelines for local governments.

After reviewing the Draft Regional Shoreline Adaptation Plan, Staff Report and Preliminary Recommendation, we hope that BCDC will consider the following points:

- We request that all previous work to plan for sea level rise, including but not limited to vulnerability assessments, projections and others be counted towards requirements. We would like this to be made more explicit in the guidelines.
- The draft guidelines state that local governments must work with other regional transit and utility agencies, however, we have concerns about agency capacity to coordinate with all jurisdictions under the 2034 deadline.
- We request BCDC to create a draft, all-inclusive Scope of Work as an attachment to the RSAP with a rough monetary value associated, for local governments to use to understand the staff time and funding needed. This will help local governments that have already adopted plans or have plans underway identify what further work actively complies and what may be additionally needed to comply with the guidelines.
- We have concerns regarding funding for all jurisdictions to make these plans and would like a clear path for funding identified.

If you have any questions or would like to discuss points outlined in this letter, please contact TAM Associate Transportation Planner Mikaela Hiatt at mhiatt@tam.ca.gov. Thank you for your consideration.

Sincerely,

Anne Richman
Executive Director

COMMENT #218

PDF – San Francisco Bay Joint Venture



October 17, 2024

Commissioners and staff
San Francisco Bay Conservation & Development Commission (BCDC)
375 Beale Street, Suite 510
San Francisco, CA 94105

MANAGEMENT BOARD:

NGO and Industry Members:

Audubon California
Audubon Canyon Ranch
Bay Planning Coalition
Citizens Committee to
Complete the Refuge
Ducks Unlimited
Point Blue Conservation Science
Pacific Gas & Electric Company
Save the Bay
Together Bay Area
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California Wildlife Conservation Board
Coastal Region, Mosquito &
Vector Control Districts
National Marine Fisheries
Service
Natural Resources
Conservation Service
San Francisco Estuary Partnership
SF Bay Regional Water Quality
Control Board
U.S. Army Corps of Engineers
U.S. Environmental
Protection Agency
U.S. Fish & Wildlife Service
U.S. Geological Survey

RE: Comments on the Draft Regional Shoreline Adaptation Plan
(RSAP)

Dear BCDC Commissioners and staff,

Thank you for the opportunity to comment on the public draft RSAP. We appreciate the dedication and hard work that BCDC, in particular the staff, has put into seeking input and incorporating feedback to develop this public draft RSAP. Our comments on the public draft are framed by:

The learning that the San Francisco Bay Joint Venture (SFBJV) Management Board has gained over the past almost thirty years working collaboratively to protect, restore and enhance the region's habitats for the benefit of birds, other wildlife, and people.

Our intention is to strengthen the RSAP Guidelines in four areas:

1. We amplify and support the comment letter submitted by the Confederated Villages of the Lisjan Nation.
2. Improve the Ecosystem Health and Resilience Strategic Regional Priority by adding a table from our [Implementation Plan](#) on page 43 as Figure 2-4 to accompany Figure 2-3.
3. Enable regional partners to support BCDC and local governments to track habitat and nature-based solution projects and progress, and develop project funding by requiring the use of SFEI EcoAtlas in F2 and G1b.
4. Activate an Adaptive Management Program in Element F, as called for in BCDC's Bay Plan Climate Change Policy 6.

Framing:

The 25-member SFBJV Management Board is composed of regional (including BCDC), State, and Federal agencies, companies, non-profit organizations, and individuals. They have committed to voluntarily and collaboratively setting, revising, and accomplishing the region's habitat goals with the ultimate purpose of stewarding this region of global biodiversity importance for all who depend on it - nature and people. We believe in working together to achieve RSAP's One Bay Vision where "habitats that we depend on to sustain our quality of life in the Bay Area are thriving."

In the more than twenty years since completion of the original 2001 SFBJV Implementation Strategy, the amount of protected and restored habitat has increased. We have updated and increased our habitat conservation goals from those in the original Implementation Strategy. And as our understanding of emerging threats grows, the [revised plan](#) released in 2022: 1) incorporates our accomplishments to date; 2) includes an expanded and modified geographic scope; 3) includes goals based on habitat function and the need for connectivity of habitats to restore whole, functional, and intact ecosystems; 4) addresses accelerating challenges posed by sea level rise (SLR) and other drivers; and 5) addresses the urgency to achieve habitat goals as quickly as possible because of both decreasing sediment availability for restoration purposes and increasing understanding of SLR impacts.

The SFBJV has also learned that a region-wide commitment to tracking progress is a cornerstone of adaptive management and is an essential approach to constantly evolving physical, political, and financial landscapes. An adaptive management approach enables BCDC and regional partners to reflect together, celebrate progress, articulate learnings, and revise strategies when needed.

Input to Strengthen the RSAP:

Incorporate the changes that the Confederated Villages of the Lisjan Nation submitted in their comment letter.

Comment 1: During BCDC's Design Review Board meeting on October 7, 2024, we learned from Lucy Gill, Cultural Resources Manager, Confederated Villages of Lisjan about areas to strengthen the RSAP: require Tribal consultation and incorporate Traditional Knowledge as equal to Western science. We fully support their recommended changes.

Section 3.5.2 Best Available Data Criteria and BCDC Regionally Available Data

Comment 2: Add Traditional Knowledge to Best Available Data, and clarify which Delta Stewardship Council document that Section 3.5.2 is from, since the Delta Plan Appendix 1A ([2015](#)) is outdated and incorrect to use as it ranks " [the] most to least scientific credibility for informing management decisions" with Traditional Knowledge listed fourth out of four. Please see the Delta Stewardship Council's public review draft, Tribal and Environmental

Justice Issues in the Sacramento-San Joaquin Delta: History and Current Perspectives ([September 2024](#)) for what they've learned and how "this issue paper is an important first step in acknowledging and responding to the concern of Tribal and EJ communities (page 4)." They write, "There is currently a lack of recognition that Traditional Knowledge is one of the primary sources of scientific information for Best Available Science, based on thousands of years of observation and application (DSC, 2015) (page 6)."

Section 1.4.2 Box called Towards Greener Adaptation

Comment 3: Improve the box on page 33 called, "Towards Greener Adaptation" by editing the first sentence to be "Using natural and nature-based adaptation (see pages 10-14 of the SFB RWQCB [June 2024 Basin Plan amendment](#) as definitions and examples of nature-based solutions) to reduce coastal flood risk..."

Section 2.3.2: Ecosystem Health and Resilience - Strategic Regional Priority: Complete and Connected Ecosystems

Comment 4: Improve Figure 2-3:

- Change heading: "Existing Estuarine-Upland Transition Zone" to "**Connectivity Opportunities**"
- Change orange label to "**Estuarine-Upland Transition Zone**"
- Change pink label to "**Undeveloped Migration Space**"
- **Edit the description of Figure 2-3** to be: "This map shows habitat protection and restoration opportunities for local jurisdictions to plan for and implement as part of their adaptation strategies. Go to the Mapping Platform for current and future data layers to support habitat and nature-based solution planning and implementation."

Comment 5: Add the following table as Figure 2-4 to accompany Figure 2-3. Title it: SF Estuary Habitat Acreage Goals representing protection, restoration, and enhancement opportunities to plan for and implement as part of your adaptation strategies. Describe it: These numeric habitat acreage goals can overlap across the categories: protect, restore and enhance, meaning the same acre may need to be both protected and restored and/or enhanced. Cite: [SFBJV Plan](#) (page 43).

SF ESTUARY HABITATS	PROTECT	RESTORE	ENHANCE
Baylands — Non-tidal wetlands & waters	59,000	NA	27,000
Baylands — Tidal marsh		72,000	11,000
Tidal flat	12,000	4,000	6,000
Beach	36 miles	Beaches that are functionally stable under present and future conditions	
Submerged aquatic vegetation	8,000		8,000
Shellfish beds	protect all existing native oyster beds		8,000
Estuarine-upland transition zone	16,500	15,100	2,500
Adjacent Uplands	14,000	NA	NA

Enable regional partners to support local jurisdictions in raising funding to implement adaptation strategies, and track progress toward achieving successful regional sea level rise adaptation and resilience.

Comment 6: Require the use of SFEI EcoAtlas in Elements F2a and G1b such that habitat and nature-based solution projects and their associated costs are publicly tracked and updated in SFEI EcoAtlas. Require habitat and nature-based solution projects to be tracked and updated in SFEI EcoAtlas and incorporate SFEI EcoAtlas training and ongoing assistance as part of the Local Assistance Program so that local jurisdictions enter projects into the tracking system as projects are in three phases: 1) planning, 2) implementation, and 3) completed. Also, require local jurisdictions to enter the project funding needs in SFEI EcoAtlas during planning and implementation phases so that regional partners can support raising funding for these projects.

As context, SFEI [EcoAtlas](#) is a well-established online, public project tracking system that captures a range of project information and **can be used to generate region-scale information critical to BCDC's ability to assess progress at the regional level.** Requiring SAPs project entry into SFEI EcoAtlas will enable efficient SAP reporting. The combination of providing data on the RSAP Online Data and Mapping Platform with the online project tracking via SFEI EcoAtlas:

- Encourages collaboration among local jurisdictions to develop SAPs and track progress using publicly available data and SFEI EcoAtlas database;
- Lowers the potential for and ultimately the costs of “reinventing the wheel” that developing an individual jurisdiction’s tracking system would incur; and
- Enables partners to support BCDC in tracking progress and funding needs at **the regional scale** to achieve shared habitat goals and implement nature-based solutions that are a key part of realizing the RSAP’s One Bay Vision.

As an example of how the last bullet point is implemented: last year the Association of Bay Area Governments and Metropolitan Transportation Commission used the adaptation project cost information that project proponents provide in SFEI EcoAtlas as one of three sources to estimate the \$110 billion cost to adapt to sea level rise by 2050 ([link](#)).

Activate an Adaptive Management Approach by clarifying and weaving together Elements C4c, D4a-c, F3a-b, and G to track projects, celebrate progress, reflect on learnings, and course-correct strategies.

Comment 7: Cut B2d: Planned future conditions: this requirement does not belong in Element B: Existing Conditions, and is redundant of other Elements, such as information that will be developed in Elements C and D.

Comment 8: Edit F3 to “Include an **adaptive management program** that describes how adaptation strategies and triggers are being assessed to ensure adaptation pathways **are being** effectively implemented.” BCDC’s Bay Plan Climate Change Policy 6 calls for incorporating an adaptive management approach. Please note the change from “can be” to “**are being effectively implemented**” is to ensure assessment and adaptive management are ongoing through implementation.

Comment 9: Change F3a to “Adaptive management program,” edit the F3a description, and incorporate F3b into F3a. Edit F3a to: Develop an **adaptive management program** that identifies a lead (if different than lead identified in F1a) and that is 1) centered on activating the second sentence in the definition of adaptation pathways on page 36: “Pathways rely on developing triggers and decision points and *monitoring the effectiveness of strategies and changing physical and social conditions that signal when changes to the pathways need to occur* (italics added for emphasis).” And 2) made up of components articulated throughout Elements C and D, specifically, **clarified elements C4c, and D4a-c.**

Comment 10: Clarify C4c: timing and phasing: this is the first place in the guidelines where local jurisdictions have to identify the timing, triggers or decision points based on local conditions and risks that can help identify when changes in conditions prompt changes in vulnerability.

Question: How do these timing, triggers or decision points relate to the triggers, decision points, lead times, and adaptation strategy efficacy and lifespan in D2a?

Comment 11: Clarify what the conceptual design in D2a contains as compared to the schematic diagram in D4a and b that provides additional details on the phasing of adaptation strategies for different SLR scenarios and includes identification of triggers, decision points, lead times, and adaptation strategy efficacy and lifespan.

Comment 12: Edit F3b to be a part of F3a so that measures and communication of progress are required components of the adaptive management program.

Thank you for the opportunity to comment on the public draft RSAP. We look forward to continuing working together with BCDC and all of our partners to achieve the future described in the RSAP's One Bay Vision where habitats that we depend on to sustain our quality of life in the Bay Area are thriving. If you have any questions, please contact me at (970) 420-3917 or kmccune@sfbayjv.org.

Sincerely,

A handwritten signature in blue ink that reads "Kelli McCune". The signature is written in a cursive, flowing style.

Kelli McCune
San Francisco Bay Joint Venture Coordinator

COMMENT #219

PDF – The Confederated Villages of Lisjan Nation



Confederated Villages of Lisjan Nation
(510) 575-8408 PO Box 6487 Oakland CA 94603

San Francisco Bay Conservation and Development Commission
375 Beale Street Suite 510
San Francisco, CA 94105

Subject: Public comments on BPA No. 1-24 on the Bay Plan Climate Change Policy amendment and draft Regional Shoreline Adaptation Plan

Commission Chair, Vice Chair, Commissioners, and Staff:

The Confederated Villages of Lisjan Nation is made up of the six tribes that were enslaved at Mission San Jose in Fremont, California and Mission Dolores in San Francisco, California: Chochenyo speaking (Ohlone), Karkin speaking (Ohlone), Bay Miwok, Plains Miwok, Delta Yokut, and Napien (Patwin). For hundreds of generations, Lisjan people have belonged to the land and waters of the East Bay. Today, our traditional territory is divided into five counties: Alameda, Contra Costa, and San Joaquin, and parts of Napa and Solano along the waterways. Even after more than two centuries of genocide and colonization, we continue to steward our ancestral homeland and revitalize our cultural practices, which come from our reciprocal relationships with the plants, animals, and other beings we share this land with. Our essential role in ensuring climate mitigation, adaptation, and resilience for our territory on the San Francisco Bay and Delta has been recognized by city, county, and state governments; other Tribal governments; federal agencies; and non-governmental organizations. We currently serve on the Steering Committee for San Leandro Bay / Oakland / Alameda Estuary Adaptation Working Group, which is already developing a Subregional Adaptation Plan. We also provided a Letter of Support for the City of Richmond's successful Ocean Protection Council Sea Level Rise Adaptation Planning grant, and a Tribal representative will serve on that grant project's Scientific Advisory Committee.

We are happy that the BCDC has drafted a Regional Shoreline Adaptation Plan (RSAP) to help local governments work together and develop plans that align with each other to address sea level rise. We especially appreciate the attention to nature-based solutions and collaborative governance, to ensure complete and connected ecosystems. We also appreciate the intent of informally encouraging local governments to build relationships with Tribal governments and incorporate Tribal Cultural Resources into Shoreline Resilience Subregional Plans. **However, we are concerned that the Regional Shoreline Adaptation Plan as drafted establishes no requirement or protocol for local governments to conduct government-to-government consultation with California Tribal Nations,** despite Executive



Confederated Villages of Lisjan Nation

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Orders from Governor Brown (B-10-11) and Newsom (N-15-19) that affirm and reaffirm the responsibility of state agencies to consult with all California Tribal Nations on any agency activities that may impact them. We are especially concerned about this given that there are no clear requirements for local governments to carry out Environmental Impact Reports as a condition of Subregional Plan approval.

There are precedents in state legislation, including SB 18 (2004), AB 52 to CEQA (2015), and AB 168 to SB 35 (2020), for requiring government-to-government consultation with California Tribal Nations on any project that may impact Tribal Cultural Resources. Most of Lisjan Nation's sacred shellmounds, where our ancestors are buried, are built where freshwater meets saltwater, where our creeks flow into the Bay. As a result, any adaptations to sea level rise have the potential to either help protect our sacred places or adversely impact them. The only way to identify and protect Tribal Cultural Resources is to establish a requirement and protocol for conducting government-to-government consultation with California Tribal Nations. Protocols for Tribal consultation under California law were first established in SB 18, and those protocols have been the basis for Tribal consultation under AB 52 to CEQA and AB 168 to SB 35. As such, Lisjan Nation would recommend using the language from SB 18, which Tribes and state agencies are already familiar with, as a starting point for establishing Tribal consultation requirements under RSAP.

We emphasize, however, that appropriate protocols for consultation within the context of RSAP can only be determined by consulting on the draft document with California Tribal Nations, particularly the other Tribal Nations that, like Lisjan Nation, have traditional territory along the San Francisco Bay shoreline. We are concerned that Lisjan Nation was not consulted on the Draft RSAP. While we are taking advantage of the public comment period to express many of our concerns, **participating in public comment is not a substitute for government-to-government consultation**, as it does not recognize the particular responsibility of the state of California to California Tribal Nations or Tribal sovereignty. It also does not allow us to share Tribal Knowledge that may be pertinent to the RSAP but is inappropriate for sharing in a public setting. We request that Tribal Nations have the opportunity to engage in formal consultation on the RSAP before it is finalized.

We are also concerned that there is no discussion of Tribal Knowledge in the draft RSAP, despite federal and state policy that recognizes Tribal Knowledge as coequal to Western scientific knowledge and instructs state and federal agencies to include Tribal Knowledge in decision-making (see "Indigenous Traditional Ecological Knowledge and Federal Decision Making" [Office of Science and Technology Policy and the Council on Environmental Policy 2021] and subsequent instructional guidance from the Biden administration). When it comes to planning for shoreline adaptation, Tribal Nations are the only communities that have lived in



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the Bay Area long enough to have seen sea level change substantially, and adapt to it successfully. Therefore, in order for these adaptation efforts to be successful over not just the next 50 or 100 years, but the next seven generations and beyond, engaging meaningfully and respectfully with Tribal Knowledge is imperative. The draft RSAP adapts its criteria for “best available data” from the Delta Stewardship Council (DSC). We encourage the BCDC to review DSC’s “Tribal and Environmental Justice Issue Paper,” which advocates “the appropriate interweaving of tribal traditional knowledge into resource management decisions and practices” (2024:29). As this issue paper also makes clear, it is inappropriate and impossible to include Tribal Knowledge without requiring early and meaningful government-to-government consultation with Tribal governments.

As a sovereign Tribal Nation whose ancestors have lived in the Bay Area since time immemorial, and whose Tribal Cultural Resources are threatened equally by anthropogenic sea level rise (resulting from colonization and industrialization) and insufficiently-planned construction along the Bayshore, we respectfully ask that the Commission include a formal requirement for meaningful Tribal consultation as a condition of Subregional Plan approval. We also request that the draft RSAP be circulated to all Bay Area Tribal Nations and that BCDC invite consultation on this draft document, so that appropriate protocols can be developed for ensuring meaningful consultation going forward. We thank you for your consideration of these comments, and we look forward to working together to repair the damage that humans have done to the Bay Area over the last two centuries, in order to sustain all of our relations who call the Bay Area home.

Uni’ (Respectfully),

Corrina Gould, Tribal Chair, Confederated Villages of Lisjan Nation

Comment #220

PDF – City of San Rafael



October 17, 2024

San Francisco Bay Conservation and Development Commission
Metro Center
375 Beale Street, Board Room
San Francisco, CA
Sent via email to: publiccomment@bcdc.ca.gov

Subject: Public Comment on Bay Plan Amendment No. 1-24 to Adopt a Regional Shoreline Adaptation Plan and Establish Guidelines for the Preparation of Sea Level Rise Plans Pursuant to Senate Bill 272 (Laird, 2023)

Dear Bay Conservation and Development Commission,
As Mayor of the City of San Rafael, I would like to submit a public comment for the Bay Plan Amendment No. 1-24 to Adopt a Regional Shoreline Adaptation Plan and Establish Guidelines for the Preparation of Sea Level Rise Plans Pursuant to Senate Bill 272 (Laird, 2023).

First, I would like to applaud the staff at BCDC for creating so many opportunities for elected officials, staff, and residents to help shape these new requirements. We recognize that this draft reflects multiple iterations, and we appreciate the incorporation of many of our prior suggestions.

I would also like to emphasize what a high priority it is for me personally and to the City of San Rafael to prepare our community for sea level rise. By many metrics, we are the most vulnerable community in the Bay Area and one of the most vulnerable to flooding nationwide. The extent of the impact here is exceptional, and we want to work in partnership with BCDC to prevent as much of that damage as we can. It is in that spirit that I would like to offer the following suggestions that BCDC with each further described in the following paragraphs:

1. Accept existing work
2. Lead the coordination of federal, state and regional agencies
3. Provide sufficient funding to comply with plan requirements
4. Provide more flexibility on adaptation strategies
5. Utilize Year 1 to better understand existing conditions and funding requirements

Accept existing work, especially for the “Existing Conditions” and “Vulnerability Assessment” requirements. More than a million dollars has already been invested in San Rafael on high-quality studies that have repeatedly demonstrated the

vulnerability to sea level rise. As the guidelines are currently written, prior studies would only be accepted if they conform to **all** the requirements outlined. At the very least, the language needs to be edited to provide more flexibility to accept existing work. Here in Marin, we have a very specific example with the Transportation Authority of Marin's (TAM) recently completed study of sea level rise vulnerabilities and potential projects to address those vulnerabilities. Unless existing studies like this one are accepted, quality prior work would need to be redone to fully comply with the content, process, and methodology requirements outlined in this draft. Simply put, San Rafael does not have the resources to re-do work. We would be forced to reallocate resources away from the adaptation and mitigation actions already underway to this planning effort.

Lead the coordination of federal, state, and regional agencies with responsibility over the relevant strategic regional priorities. In addition, it needs to be examined as to exactly how local jurisdictions could comply with the requirements to coordinate and plan for adaptation projects for assets that are outside of the city's control. I completely concur with the urgent need to remediate vulnerable contaminated sites, ensure the continuity of our regional transportation network, protect critical facilities, and reduce service deficiencies in underserved communities. While I appreciate the revisions to this draft, the current version does not fully reflect the real governance and jurisdictional constraints around these issues. I respectfully submit that on the issues where the state has primary responsibility and control over resource allocations, that BCDC convene the relevant agencies and utilities. This regional approach would be more efficient and lead to better outcomes. It is more likely to move the needle on implementation and funding so we can meaningfully address these challenges. Simply put, BCDC should lead the coordination of state and regulatory agencies at a regional level to prevent unnecessary or duplicative work by local jurisdictions.

Provide funding to comply at a scale commensurate with the requirements. As written, compliance with the draft guidelines will require significant resources. The legislation mandates reimbursement to the cities, but this could result in the City of San Rafael being forced to provide upfront funding. In our estimation grants are not currently available to local governments at the scale required. Meaningfully complying with the admirable equity provisions will also require additional resources for community-based organizations. Providing more of the data requested would help address this gap. Simply put, compliance will have significant financial implications, so we request either sufficient, non-competitive grant funding be made available to comply or that the requirements be predicated upon the availability of funding.

Provide more flexibility on adaptation strategies. Communities with significant existing flood risk and environmental justice challenges, like San Rafael, will require a different approach to adaptation. Additionally, securing funding for adaptation projects will entail participation of outside agencies (i.e. FEMA, the US Army Corps, CalTrans). Each agency has their own extensive requirements for the planning process and project design. Simply put, to avoid inadvertently creating another

standard that projects must comply with, we ask that the guidelines be revised to clarify that complying with another agency's design standards will also satisfy BCDC's standards.

Utilize Year 1 to better understand existing conditions and funding requirements. I respectfully suggest that BCDC use Year 1 to focus on gathering an inventory of existing work and work with the 9 Bay Area Counties and 101 cities to cross check which required elements they have already satisfied, and which require further analysis. After BCDC has completed this inventory, further refinements can be made to the framework. This important foundational step would enable BCDC to better understand the regionwide funding needs. It would also benefit local governments allowing them to tailor their efforts to where it is most needed. In order to support this approach, I also suggest that BCDC first provide an example of a detailed scope of work and sample budget. This practical addition would help local governments understand and plan for the resources needed to implement these crucial adaptations.

In closing, I appreciate the opportunity to provide input and know that BCDC staff and Commissioners will carefully consider our comments. San Rafael fully supports the overall objective of SB 272 and the challenge for all cities is to balance this planning effort with other pressing local priority policies which, here in San Rafael include addressing the issues of affordable housing, homelessness, economic growth, wildfire prevention and social justice. I am optimistic that BCDC will further refine the RSAP process as we collectively move from the legislation's objectives to practical implementation by cities.

Sincerely,



Kate Colin

Mayor, City of San Rafael

Comment #221

PDF – State Coastal Conservancy



October 17, 2024

To: Jaclyn Perrin-Martinez
SF Bay Conservation and Development Commission
publiccomment@bcdc.ca.gov

From: Jessica Davenport, Evyan Sloane, Marilyn Latta, Shalini Kannan
State Coastal Conservancy

Re: Comments on Regional Shoreline Adaptation Plan, Draft for Public Comment (September 2024)

Thank you to the SF Bay Conservation and Development Commission (BCDC) staff for your work on developing the Regional Shoreline Adaptation Plan (RSAP) Public Draft. The State Coastal Conservancy (SCC) appreciates your incorporation of the majority of our comments on previous drafts shared with the RSAP Advisory Group, on which we serve, as well as the opportunity to comment on this public draft as you move toward adopting the final guidelines. SCC, along with the Ocean Protection Council, has also supported the development of the RSAP Guidelines with grant funding. We appreciate that BCDC has listened to a wide range of perspectives, holding community workshops, focus groups with local planners, meetings of a local elected regional task force, and numerous meetings with interest groups and technical experts. The State Coastal Conservancy is very supportive of the current draft as it reflects both Bay Area values and best practices for shoreline adaptation at the state and national levels.

The draft RSAP, including the One Bay Vision, Strategic Regional Priorities, Subregional Shoreline Adaptation Guidelines, is a groundbreaking effort to integrate top-down and bottom-up planning. The RSAP does an excellent job of establishing the "One Bay Vision" for addressing sea level rise and lays out a series of "Strategic Regional Priorities" stemming from the vision in the following areas: community health and well-being; ecosystem health and resilience; development, housing and land use; critical infrastructure and services; public access and recreation, transportation and transit; shoreline contamination; and collaborative governance, flood management, and funding. The regional vision and priorities set the context for Subregional Shoreline Adaptation Plan Guidelines, including plan elements, minimum standards, and support tools.

The SCC is a non-regulatory and project-driven state agency whose mission is to protect, restore, enhance coastal resources and increase opportunities for the public to enjoy them. SCC has a long history of funding, planning, permitting, and implementing ecological restoration and public access

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projects in and along the shoreline San Francisco Bay and throughout the nine-county Bay Area. In the Conservancy's 2023-2027 Strategic Plan, we prioritize equity, including committing funding to benefit systemically excluded communities, and climate resilience.

We have developed strong working relationships with many public agencies, nonprofits, and community-based organizations on habitat restoration and public access efforts. The regional networks of partners in the SF Estuary Invasive Spartina Project, SF Living Shorelines Project, South Bay Salt Ponds Restoration Project, Hamilton and Bel Marin Keys Wetland Restoration Project, San Francisco Bay Restoration Authority, Bay Trail, Water Trail, and other regional efforts are recognized as extensive and diverse collaborations of public and private agencies and landowners engaged in collaborative restoration and public access projects. Our goal is to implement projects based on best habitat protection and public access design practices, to monitor outcomes, and to share results and lessons learned from the projects, so that successful nature-based techniques and adaptive public access elements can be incorporated into future restoration projects. We prioritize projects that benefit historically excluded communities, return power to tribes, support meaningful community engagement, and incorporate workforce development.

Living shorelines have been shown to be a successful method of a combined natural bank stabilization and habitat enhancement approach that can also be utilized as a climate adaptation strategy in low- to medium-energy coastal and estuarine environments. Living shorelines and other nature-based climate adaptation approaches have been successfully tried and tested by US Fish and Wildlife Service, NOAA, and other partners for more than two decades on the East Coast and the Gulf Coast, and since 2012 by the SCC and multiple local, state, federal, and non-profit partners at multiple sites in California. The projects have resulted in increased public awareness of nature-based shoreline adaptation techniques and benefits, and capacity-building for nature-based design, permitting, and construction with coastal engineers, ecologists, marine contractors, and permitting agencies. The projects have resulted in increased wave attenuation benefits, sediment stabilization and shoreline protection, and habitat restoration and enhancement for fish, mammals, birds, and a wide variety of aquatic and shoreline species.

There is strong and growing interest in testing nature-based aquatic restoration and climate adaptation approaches on the West Coast and in SF Bay, but a shorter history of projects locally than compared to the East and Gulf Coasts, and a smaller number of projects that have been constructed and monitored. This results in a great need for experimentation and testing of pilot projects, in order to document success, and to document ecosystem services and functions resulting from various approaches. We are pleased to see that nature-based approaches are prioritized in the draft RSAP, and especially in the Subregional Shoreline Adaption Plan Guidelines, which will encourage and incentivize local jurisdictions to incorporate nature-based approaches into their plans, while also supporting and recognizing the need for experimentation and iterative learning.

SCC is very supportive of the draft RSAP, particularly the strong emphasis on equity, ecological health and resilience, public access and recreation, and the use of nature-based shoreline adaptation. As mentioned above, most of our comments on previous drafts have been addressed. However, we continue to have concerns about the Project List, a required element of each adaptation plan. We also have new comments on public access, particularly the Water Trail.

1. Element G. Project List

We recommend adding a clearer description of how the subregional project list will be prepared and vetted. We would like to see a vetting process that encourages incorporation of innovative new approaches with living shorelines and nature-based adaptation into proposed projects that do not yet have them. We would also like to encourage linkages to the SF Bay Subtidal Habitat Goals recommendations and other vetted regional conservation plans listed in our comments above. Please encourage planners to offer opportunities for review and comment to staff of major regional restoration efforts, such as the nine county Invasive Spartina Project that includes work with more than 150 landowners across 70,000 acres baywide, to ensure that adaptation plans are consistent with and not in conflict with achieving regional goals for long-standing work occurring in the bay.

We have heard from colleagues at local planning agencies that they are concerned about the requirement to develop this list of short-term projects, given that the plan is supposed to be high level and long term. The cost alone of developing both the shoreline adaptation plan and the project list, even for projects at just the conceptual stage, seems infeasible to them. If a jurisdiction already has a priority project under development, it should be vetted for consistency with the rest of the plan, not just grandfathered in, for the plans to have integrity. At SCC, we worry that jurisdictions will feel pressured to develop and include a project list before the projects are thoroughly evaluated for feasibility, community input, ecological merit, and specific expected methods and outcomes. There is also the risk of overpromising to communities, particularly environmental justice communities, when the jurisdictions don't have the resources to deliver specific projects. Many local jurisdictions have been working hard to build trust with communities, and they run the risk of losing that trust if they are unable to deliver these very expensive projects.

SCC is concerned that we and other funders will be expected to prioritize funding projects on the Project List for each plan, regardless of whether they are consistent with the plans themselves. This topic has received very little attention, as far as we are aware, and we encourage BCDC to convene some final focus groups with local planners, community representatives, elected officials, and funding agencies, to develop a more robust vetting process for the Project List. Alternatively, if time does not allow for reaching consensus on a sound approach, we suggest eliminating this element from the adaptation plans and developing a regional priority project list through a separate process with more support from those who have participated in the development of the RSAP.

2. Strong emphasis on nature-based adaptation and policy and regulatory actions as fundamental adaptation elements in the Introduction

Thank you for responding to our comments by prominently featuring nature-based adaptation and giving equal weight to policy and regulatory actions that enable adaptation in the introduction. Specifically, in the **Section 1.4.2**, we appreciate the inclusion of this language:

“Adaptation can include physical adaptation strategies that affect the natural and built landscapes of the shoreline. Physical adaptation strategies can range from natural and nature-based strategies such as constructing ecotone levees, combining marsh restoration with nearshore reefs with eelgrass plantings, or augmenting mudflats, to conventional infrastructure such as elevating land, building seawalls and flood walls, or creating levees or dikes that reduce flood risk. Adaptation can occur across a spectrum of conventional to natural and nature-based and can include hybrids of these approaches (Figure 1—7). Adaptation strategies can also be non-physical and include policy and regulatory actions such as zoning and overlay zones, revising building codes and redevelopment

standards, as well as financial strategies such as conservation easements, tax incentives, and climate resilience districts, among others.”

In Figure 1-7 and 1-8, we recommend including nature-based features in the adjacent subtidal areas/water column so that nature-based adaptation approaches like nearshore reefs and eelgrass plantings are also represented in the graphics, similar to the representation of nature-based levees.

Thank you for also including in **Section 1.4.2** a description of the “spectrum from natural and nature-based to conventional hard infrastructure and hybrid approaches,” and the “Strategic Adaptation Approaches”, now updated to include “Accommodate,” “Protect (hard infrastructure),” “Protect (nature-based infrastructure),” “Avoid,” “Relocate,” and “Prepare.” We also appreciate the callout box “Towards Greener Adaptation” that discusses some of the considerations with the early state of science and the need to champion, test, and develop permitting and engineering guidance that is suitable for nature-based approaches.

Thank you for including in Section 2.3.2 Ecosystem Health and Resilience more focus on subtidal and intertidal habitats in addition to wetlands, including adding bathymetry and habitat types to the Figure 2-3 map on page 52. Please include a definition of shallow subtidal (0-10 feet deep) and deep subtidal (10-30+ feet deep). SCC would like to provide additional pictures of subtidal and intertidal habitat types to include in the document, to better represent these habitats in addition to the many pictures of wetlands and shorelines. On page 51, under recommended to assess- please correct text to note **immobile** rock substrate, and please consider including seaweed (aka macroalgal) beds. In Section 2.3.7 Shoreline Contamination, please consider including reference to derelict creosote pilings and structures, as more than 33,000 derelict pilings have been mapped in SF Bay and an additional 33,000 stubs and pieces are estimated to be on the bay floor. This is a big issue for many shoreline and nearshore sites to consider and remove, in order to not build nature-based adaptation on top of contaminated piles and structures. These creosote structures contain PAH’s and have been documented to degrade water and sediment quality, and cause impacts to species such as Pacific herring. We also recommend including reference to other marine debris- such as concrete rubble, cars, shopping carts, tires, and other subtidal and shoreline debris that causes ecological and public health impacts and also navigational and public access hazards.

3. More Examples of Nature-Based and Hybrid Adaptation Strategies

In the section **3.1.1 Planning Process, 3.1.2 Existing Conditions and others**, please consider adding to the term “landscape” (planning, considerations, assessment) throughout the document, and include adjacent “shorelines, aquatic areas, nearshore areas” in this context. There has been a historical bias towards attention to land and lack of attention to what is underneath the waterline or on the shoreline, and we recommend that the text directly address aquatic areas and shorelines as specifically as possible. We greatly appreciate the added reference to subtidal and aquatic habitats in many sections of the document, but this can still be improved so that the focus does not default to terrestrial land/urban areas that are adjacent to the shoreline and bay.

In section **3.1.1 Planning Process A2, B2.A,B,C re mapping plan area**, please consider including a minimum distance of subtidal area that should be included in the plan area, such as a minimum of 100 feet from the MLLW shoreline edge. Without any guidance on this, many jurisdictions do not have enough information and context to set the boundary to include, and may well default to a subtidal area that is too small.

In the section **3.2.4 Adaptation Strategy and Pathways Standards**, thank you for including this standard:

“12. Use nature-based adaptation where feasible. In areas along the Bay shoreline where protection approaches for flood risk reduction are utilized, adaptation must incorporate natural and nature-based adaptation strategies suitable to the landscape to the greatest extent feasible before using traditional hardscape approaches. Where nature-based adaptation is deemed infeasible, approaches should incorporate habitat enhancements (i.e., utilizing hybrid approaches such as biologically enhanced seawalls through incorporation of natural materials and surface texture diversity). In the adaptation strategies, demonstrate and describe the suitability of nature-based solutions and where nature-based adaptation is used, or habitat enhancements are incorporated.

“Strategy options to achieve this:

- Beaches with backing levee or fortified seawall
- Ecotone levee
- Living seawall
- Nearshore reefs
- Submerged aquatic vegetation
- Mudflat augmentation
- Protecting, maintaining, or restoring tidal marshes”
- Multi-habitat Living Shorelines Approaches

We appreciate the strong emphasis on nature-based adaptation as a concept and the specific examples to illustrate what it means. Nearshore reefs is a better term to use than shellfish reefs, as these reefs have been documented to provide habitat benefits to more than 100 species in the Bay in addition to native Olympia oysters, including invertebrates, seaweeds, fish, birds, and mammals. We appreciate that this term is used in the document, and recommend to check all text for consistency in use of nearshore reefs vs shellfish reefs. Please consider also including “Multi-habitat Living Shorelines Approaches” in this list, to be consistent with reference to living shorelines in other areas of the document, and to allow for additional habitat methods and combinations of methods not captured in the existing draft bulleted list.

4. Minimum Standards for Reducing Flood Risk through Promoting Pathways to Relocation out of Flood Hazard Zones and Maintaining Open Space

Thank you for providing more examples of policies that can be applied to areas that are expected to transition from developed to permanently flooded and restored to open space and habitat as sea level rises. While many areas will be protected from flooding over the long term, not all areas will be, and therefore, certain areas are likely to be good candidates for use of these policies. In addition, the Guidelines now include strong language on protecting open space along the shoreline to avoid putting new development at risk and to provide shoreline resilience, and planning for equitable relocation.

In Section **3.2.4, Adaptation Strategy Standards**, thank you for adding this guidance:

“6. Reduce flood risk in areas with existing development. Areas along the Bay shoreline with existing development — such as housing, commercial, industry — must minimize flood risk to existing development through the end of the development’s planned useful life. Strategies should consider a range of adaptation approaches to reduce flood risk, such as protection, avoidance, accommodation, relocation, and preparation, and these approaches can change over time through adaptation pathways.

“Strategy options to achieve this:

- Sea level rise overlay zones
- Real estate disclosures
- Increase free board above BFE [base flood elevation]
- Climate responsive standards and codes”

Thank you for revising this standard to include the following language:

“15. Preserve natural and undeveloped lands and open space. Areas along the Bay shoreline with existing natural lands, undeveloped lands, and/or open space areas must be protected, maintained, and where possible, expanded to avoid putting new development at risk and to provide shoreline resilience. Preservation of these lands should allow for uses such as providing public access, buffer space for future adaptation protection structures, and/or space for wetlands migration space or upland transition zone. In the adaptation strategies, demonstrate and describe where and how existing natural lands, open spaces, and undeveloped shoreline areas are being preserved and designated for shoreline resilience.

“Strategy options to achieve this:

- Zoning to maintain natural or open space
- Land acquisition
- Re-zoning
- Sea level rise overlay zones
- Conservation easements
- Transfer of development rights”

Thank you for adding a standard related to equitable relocation:

“17. Plan for changes in land use, removal of assets, and/or equitable relocation. Areas along the Bay shoreline containing assets or development at risk of flooding must incorporate policies, regulations, and/ or financial incentives that allow for transitions at the end of the asset or development’s life cycle. Transitions can include shifts in land use to lower density or less vulnerable uses, or planned removal or relocation of assets. Removal or relocation of assets should be prioritized in areas suitable for marsh migration space and upland transition zone. Removal should include structures, foundations, utilities and infrastructure both above and below ground to ensure that aging and dilapidated development does not lead to future Bay fill and contamination. In the adaptation strategies, demonstrate and describe the policies, regulations, and/or financial incentives included and timeline for implementation.

“Strategy options to achieve this:

- Increasing density outside areas of risk
- Avoidance opportunities
- Rolling easements
- Downzoning in flood zones
- Transfer of Development Rights”

5. Strong Adaptation Standards related to Ecosystem Health and Resilience and Public Access

Thank you for including strong adaptation standards related to ecosystems and public access, such as:

Maximize benefits of water-dependent shoreline uses and Baylands habitats.

- Improve public access and connection to the shoreline.
- Improve connected regional shoreline access.
- Prioritize water-dependent uses along the shoreline.
- Improve Baylands habitats and facilitate their long-term survival.
- Ensure complete and connected ecosystems.

We are pleased to see encouragement for assessing water access opportunities, including mentions of the San Francisco Bay Area Water Trail. Please consider the following recommendations related to the Water Trail to highlight the opportunity to maintain and enhance water-oriented recreation:

- Please correct and make uniform the name used for the Water Trail – as it is called by “The San Francisco Bay Water Trail” in several locations (missing “Area”, or appropriate capitalization in some locations).
- In the top section of Page 65, we recommend defining what the Water Trail is, to parallel the definition of the Bay Trail provided. You can use this, or something similar: “The San Francisco Bay Area Water Trail (Water Trail) is a growing network of designated launching and landing sites, or “trailheads,” around the bay that enable non-motorized small boat users to enjoy the historic, scenic, cultural, and environmental richness of San Francisco Bay and its nearby tributary waters.”
- We recommend including water access points in the SRP Adaptation Standard to “Improve Connected Regional Shoreline Access Networks” along with water access points, including SF Bay Area Water Trail designated trailheads, allow the public to experience the waters of the Bay in an immersive and multi-sensory way, that provides a different and significant perspective. Along with the waterfront parks, beaches and trails that are already highlighted in the SRP Adaptation Standard, and that provide land-based public access, water access points provide an important alternative way to recreate. Preserving and improving these facilities should be a priority. Similarly, we recommend that “Water- Oriented Recreation” in the “Minimum Categories and Assets” table be highlighted as an SRP.
- Under Assets and Data Sources on Page 65, please consider including the Water Trail website (<https://sfbaywatertrail.org/>) where one can find a map of the trailhead network. Please let us know if there are additional data/assets that you’d like us to make available to assist local jurisdictions with their planning. If the downloadable GIS datasets of designated sites would be helpful, we can assist you in obtaining these.

6. Using Existing Plans and Plan Content

In **Section 3.5.1 Using Existing Plans and Plan Content**, thank you for incorporating our comment by adding this language in the text box:

“Habitat Information in Existing Plans. When using existing plans, it is important to carefully review and consider how information about specific Baylands habitats and species, especially along the gradient of subtidal, intertidal, and uplands, is characterized and incorporated. This information may not be available and/or adequate in existing plans and additional evaluation may be necessary to supplement this information for compliance with the Guidelines. Understanding the conditions of the Baylands habitats can provide stronger physical and ecological resilience if incorporated across multi-objective adaptation plans. Existing plans related to this issue should ensure that information is provided on current habitat conditions and ecological functions and how ecosystem health and functions will be improved as part of the adaptation strategies.”

We appreciate BCDC’s efforts to create an **RSAP Mapping Platform** that will support development of various sections of the plan with regionwide data. We are pleased that BCDC has been working closely with groups like the San Francisco Estuary Institute to provide data on existing and potential Baylands habitats that can support compliance with the Guidelines.

In the **Glossary**, please consider including the terms Nature-Based Adaptation, Hybrid Adaptation, Subtidal Habitats, Living Shorelines, and each of the nature-based habitat approaches listed in the required list to consider. Even if defined elsewhere throughout the document, it would be helpful to include these lesser-known terms in the Glossary to help normalize them.

Thank you very much for reviewing our comments. We would be happy to talk more specifically about any of our input.

Comment #222

PDF – City of Mill Valley



October 17, 2024

San Francisco Bay Conservation and Development Commission
Metro Center
375 Beale Street, Board Room
San Francisco, CA

Subject: Public Comment on Bay Plan Amendment No. 1-24 to Adopt a Regional Shoreline Adaptation Plan and Establish Guidelines for the Preparation of Sea Level Rise Plans Pursuant to Senate Bill 272 (Laird, 2023)

Dear Bay Conservation and Development Commission,

The City of Mill Valley is submitting public comment for the Bay Plan Amendment No. 1-24 to Adopt a Regional Shoreline Adaptation Plan and Establish Guidelines for the Preparation of Sea Level Rise Plans Pursuant to Senate Bill 272 (Laird, 2023). The City of Mill Valley is committed to addressing sea level rise and was recently awarded a \$965,000 SB 1 grant from the Ocean Protection Council to collate existing coastal flood hazard exposure and risk information along the shoreline, develop a robust community engagement and outreach effort to bring the community voice into shoreline planning, develop an adaptation plan, and identify prospective adaptation strategies. The City has identified key next steps to protect the community and is ready to move these priority protection measures into implementation.

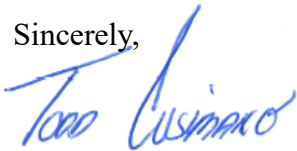
After reviewing the Draft Regional Shoreline Adaptation Plan, Staff Report and Preliminary Recommendation, we hope that BCDC will consider the following points from the perspective of a local government that has already completed thorough planning to address sea level rise.

- We request that all previous work for sea level rise, including but not limited to vulnerability assessments, climate adaptation plans, hazard mitigation plans, etc., be recognized towards the requirements. The current draft guidelines state that previous work may be used, but does not provide clear guidance on how existing plans will be evaluated and place the burden on jurisdictions to ensure compliance. Direct guidance and technical assistance by BCDC to individual jurisdictions regarding which elements of the guidelines are not met by existing plans would help alleviate this burden. Additionally, it would be beneficial if there was a process to submit individual elements of the plan for progress reviews. If one element is found to be inadequate during the full review, it would likely require updates to other elements of the plan which could include additional stakeholder and community engagement.

- We request that BCDC create a draft, all-inclusive Scope of Work with a rough cost associated for local jurisdictions to use to understand the true amount of staff time and funding needed. Since many local governments already have adopted plans or have plans underway, a Scope of Work could be used to amend current plans to fulfill guideline requirements.
- We request that BCDC consider removing the timeline requirements for updates, create an exemption process for requirements, and provide assistance and clarity on CEQA guidelines.
- The draft guidelines state that local governments must work with regional transit and utility agencies, however, we have concerns about agency capacity to coordinate with all jurisdictions under the 2034 deadline. Additionally, while jurisdictions are subject to the plan approval deadline, some agencies required to be part of the coordination process are not. Engaging in a meaningful and equitable way will be dependent on available resources.
- We have concerns about funding for all jurisdictions to make these plans. The City of Mill Valley anticipates spending at least \$200,000 in local funds in addition to grant funds on climate adaptation planning, plus significant staff time. We would need additional funding to meet the requirements outlined in the draft guidelines.
- We have concerns about staff time required to fulfill these new planning requirements, while also moving forward urgent implementation projects to protect our community that have already been identified through previous planning efforts.

If you have any questions or would like to discuss points outlined in this letter, please contact the City's Climate Action (Sustainability) Coordinator Grace Ledwith at gledwith@cityofmillvalley.org.

Sincerely,



Todd Cusimano
City Manager

Comment #223

PDF – City of Palo Alto



Public Works

250 Hamilton Avenue
Palo Alto, CA 94301

October 18, 2024

San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105

Email: publiccomment@bcdc.ca.gov

Dear Ms. Perrin-Martinez,

Thank you for the opportunity today to provide feedback on Bay Conservation Development Commission's Draft Regional Shoreline Adaptation Plan. The City of Palo Alto truly appreciates the magnitude of thought that BCDC put into developing this document and the colossal effort to launch the coordination of regional sea level rise planning.

We offer the following main recommendations from a city perspective on the RSAP requirements and have provided an attached list of more detailed feedback.

- 1. We urge that the guidance be simplified and consolidated, particularly Section 3.** We recommend clearer differentiation between mandatory and optional planning requirements, and that these distinctions be embedded directly into the checklists. Information is distributed throughout sections and could be consolidated in a different way to help agency staff who will develop these plans to be more efficient in moving through the extensive detail and requirements. We also recommend that BCDC enlist a small working group of practitioners that would actually be using the guidance to draft local plans, to weigh in on how to make the guidance more succinct and clear.
- 2. We urge a recommended schedule for completing the successive RSAP tasks, similar to the Municipal Regional Stormwater Permit.** Phased deliverables would allow for subregional partners to focus their collaboration efforts. It would make the process more manageable and allow more time for BCDC to develop resources for later deliverables.
- 3. Please provide additional guidance on conducting the required economic impact analyses.** These type of assessments are very costly, and at some point have a diminishing return of value because




the costs of “no action” are so high, estimates become out of date so quickly, and there are compelling regional estimates that can be referred to. Additional guidance could improve the usefulness of this deliverable and the alignment of efforts across subregional partners.

4. **In the absence of a BCDC requirement to conduct an RSAP CEQA analysis that cities can tier off of, please provide clear guidance and assistance to help cities address the costly and time intensive CEQA process.** There may be ways to leverage regional or subregional resources.
5. **Regarding regional coordination we urge more immediate outreach to City Managers, Planning Directors and other local agency leaders.** Regional sea level rise planning is a huge effort requiring an undetermined level of agency resources. While BCDC has held a number of meetings on this topic, it does not appear that City-level staff received as much targeted outreach as is needed. Our conversations with city colleagues indicated that they are not seeing or were not asked to engage in this effort until just this fall. When awareness and support among local agency leaders is low, it impacts resourcing and engagement with the process.

In addition to the main points above, please see Attachment A for more detailed comments about the Draft RSAP guidance.

The City of Palo Alto thanks BCDC for its impressive efforts to develop this guidance and for considering local agency feedback about how the guidance can be further improved for implementation.

Sincerely,

DocuSigned by:

DF8505A6373A4DF...

Brad Eggleston
City of Palo Alto, Public Works Director

Attach: City of Palo Alto Draft RSAP Comments, October 16, 2024



Attachment A: City of Palo Alto Draft RSAP Comments, October 16, 2024

City of Palo Alto Draft RSAP Comments	
General Comments	
1.	Suggest that BCDC provide a recommended schedule for completing successive RSAP tasks so that agencies can focus step-by-step on producing the deliverables for this requirement over time. One model for this approach is the Municipal Regional Stormwater Permit that iteratively lays out deadlines for deliverables over the permit term. This approach, could for example, recommend that public agencies submit Section A, their NOI and complete CEQA requirements within first X years. This helps agencies develop timelines aligned with each other and could make the process feel more manageable. (Not suggesting that the deliverables listed are the right ones within X years, just providing an example).
2.	3.1.1 General Comment Please give agencies a report template to use similar to the Municipal Regional Stormwater Permit so that we can have a structure in place to track and respond to requirements. Cities could all use the same Word or online form so that cities are not creating that themselves, and so that BCDC gets identically structured responses from all. Make minimum requirements crisp and at the top of each section.
3.	<p>Please significantly simplify and consolidate the guidance. The length and structure of the document makes it difficult to locate the key deliverables and essential information and tools for use, especially Section 3 that has checklists, callouts, icons and snippets of information that are not immediately relevant for how they are to be used and in some cases without same-page directions. (e.g., tables 3-1 and 3-3). Illustrative Icons are used throughout the document, but they are sometimes distracting and not actually helpful to understanding information. Another example is on pg 112 where there is a call out box for D1 and D4 - it's easier for the reader to have that callout box information integrated into the actual checklist. Some requirements are embedded in tables but not in the checklist. Overall, the presentation of the guidance is gangly and very difficult to understand in terms of what needs to be produced.</p> <p>Related, please consider a small, short-term working group of local government reps who would be responsible for submitting reports to provide feedback on the structure to improve readability.</p>
4.	More outreach is needed to City Managers, Planning Directors, and other Local Agency Department Directors and City Councils. City-level staff report that Bay Area Planning Departments are not hearing much about this effort, preventing it from being properly resourced.
5.	Page 3. Both phrases "subregional shoreline adaptation plans" and "local adaptation plans" are used and it is unclear if those are two separate requirements or mean the same thing.
6.	"SF Bay shoreline accounts for 1/3 of California's coastline, yet the Bay Area is expected to experience 2/3 of the State's total economic damage from sea level rise." Funding for identified projects should take this into account, including from Federal sources.



7.	Pg 6 under "how to use this document" defines "must" and "should" (somewhat optional) but then says all standards are required. There is also reference to "minimum" standards. Please clarify expectations for each and then stick with same terms. <i>The terms "must" and "required" are used to denote content that is mandatory to be completed in Subregional Shoreline Adaptation Plans. "Should" means local governments make every attempt possible to meet the information listed. If that information cannot be provided or met, a description of why must be included. All plan requirements and standards are mandatory.</i>
Subregional Shoreline Adaptation Plan Guidelines - Plan Elements (3.1)	
8.	3.1.1 Doc page 80. This section is confusing.
9.	Under what conditions can a City check N/A checklists?
10.	Pg 83 "A4" Summarize equitable engagement efforts throughout the planning process" In addition to the definitions of vulnerable communities listed on pg 36, Cities need tools to answer these questions.
11.	Pg 86 Questions A1c,d are vague and need clarification; A4a how does the City deliver on this? What tools or process or reference exists for us to answer this?
12.	Pg 86 The City assumes N/A is an option, for example, if a city has a shoreline with no residents. Unclear about when N/A could be a response.
13.	Starting on pg 88 B1-B3 and Element B Submittal checklists are burdensome and both vague and specific at the same time. These all seem to be fitting requirements or questions to answer in a Vulnerability Assessment (e.g., transportation impacts). Asking cities to pull together this number of maps is overly burdensome with unclear benefit. This section needs to be simplified.
14.	Pg 96- Clarify what the Element B-Equity Assessment Callout box is for and how it integrates with the pg 94 checklist.
15.	In Checklist A4, cities may need more assistance identifying vulnerable communities and how to reach them. Not all vulnerable populations are visible; are we considering RV dwellers who are mobile, susceptible populations based on age or income...? How do we find these populations and meaningfully engage with them?
16.	Pg 130. The following information is core to the SLR planning efforts and should be bolded and/or pulled to the top of the section and in the Executive Summary: "For developing adaptation strategies, the RSAP requires adaptation strategies to be developed at a conceptual level and respond to vulnerabilities identified by, at a minimum, the 0.8 ft (2050 Intermediate) and 3.1 ft (2100 Intermediate) scenarios."
17.	Pg 86-87 Overall, plan requirements and submittal checklists are well laid out. Box on page 87 is confusing. How does this connect to the submittal checklist, and should those requirements be nested under A1B and A4B on page 86?
18.	3.1.2 Element B: Existing conditions - The guidance says to list and describe existing plans, studies, regulatory codes, and other information that may be relevant to addressing and responding to coastal flooding hazards. This casts a wide net and in a multi-jurisdictional plan this list may be exhaustive - define what is relevant.



19.	3.1.3 Plan indicates that existing Vulnerability Assessments may be used to meet the guidelines if they comply with standards set in this section. Most VAs are on the city level; how can they be combined with others in a larger multi-jurisdictional effort? Can they simply be cited or do they need to be rewritten to include the whole area? This could result in cities needing to repeat a lot of the work that has already been done.
Subregional Shoreline Adaptation Plan Guidelines - Minimum Standards (3.2)	
20.	This section has minimum standards for the previous section. It's confusing to see them broken out separately. Integrate minimum standards into each Section's checklists of requirements. Having Minimum Standards conflicts with guidance on pg 6 that says "All plan requirements and standards are mandatory."
21.	Please clarify section 3.2.1. There's a lot of information, but it's not clear how to use this section or the projected SLR scenarios. Which one should be used and for which kind of City assets? Explain thought process of how to use the tables when designing a project.
22.	Table 3-1 is key but needs more description telling the reader how to use. The language on pg 130 could be integrated into the table. "For developing adaptation strategies, the RSAP requires adaptation strategies to be developed at a conceptual level and respond to vulnerabilities identified by, at a minimum, the 0.8 ft (2050 Intermediate) and 3.1 ft (2100 Intermediate) scenarios."
Subregional Shoreline Adaptation Plan Guidelines - Plan Development, Submission, and Approvals Process (3.4)	
23.	Consider phased milestone for deliverables similar to Municipal Regional Stormwater Permit requirements instead of complete plan submittal.
24.	3.42 Clarify if local governments need to individually submit an NOI if they partner with a County that leads the subregional effort
25.	3.42 Recommend that BCDC conduct an RSAP EIR for cities to tier off
26.	3.4.1 Local Gov't Planning Responsibilities: Glad this plan outlines suggested roles for Counties/Cities and special districts. Requirements for special districts (flood control agencies) should be added in the future.
Data Preview (draft data layers and analysis)	
27.	Upfront in the document, clarify the sea level rise scenarios that need to be planned for with the recommendation to consider additional given that sea levels will continue to rise. We found these scenarios deep in the document on Page 109, Page 129, and Page 130. (0.8ft, 3.1ft, and 6.6ft as minimums for adaptation strategies and the addition of 4.9ft for vulnerability assessments 6.1ft, 8.1ft, and 11.7ft especially for assets with long lifespans, etc.)
28.	Are there any processes in place to address if there are conflicts between plans or if jurisdictions disagree on proposed infrastructure/projects?
29.	Given the need to update the plan every 10 years, what is the process for changing from a city plan to subregional or vice versa?
30.	How will this regional planning effort get incorporated into Plan Bay Area?



COMMENT #224

From: Jeanette Carr <carr.jeanette@gmail.com>

Sent: Thursday, October 17, 2024 5:05 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: RSAP

Thank you for your excellent report.
I agree with the proposals.

Jeanette Carr
Belvedere

COMMENT #225

PDF – PMSA

October 18, 2024

Zachary Wasserman, Chair
San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105

RE: Regional Shoreline Adaptation Plan (Bay Plan Amendment 1-24)

Dear Chair Wasserman and Commissioners,

On behalf of the members of the Pacific Merchant Shipping Association (PMSA), thank you for the opportunity to provide comments on the Public Draft Regional Shoreline Adaptation Plan (RSAP). PMSA represents marine terminal operators and ocean-going vessel owners and operators that operate at all of the San Francisco Bay's public ports.

Sea Level Rise is a significant concern for the region, especially for the maritime industry and our public seaports, and, accordingly, we believe that the significant attention and effort being applied to address this threat is appropriate. However, consistent with our comments on this subject made last year on this subject, with respect to Bay Plan Amendment 1-19 (July 21, 2023), PMSA supports the inclusion of findings and policies for sea level rise in the BCDC Seaport Plan. And, these must be consistent with the seaport trustee assessments that are already required under state law. These are required to be submitted by public ports to the State Lands Commission under AB 691 (Muratsuchi)(Chap. 592, Statutes of 2013).

It is our understanding that the RSAP does not apply to or supersede the Seaport Plan on this subject. To this point, we note that the planning and assessment requirements of AB 691 and the Seaport Plan are not included as sets of relevant laws to which the RSAP Guidelines are sought to be aligned (see RSAP pp. 20-21). To the extent that this is not the case, and BCDC specifically expects that cities with seaports to include port submissions, we ask that the RSAP avoid duplication of existing requirements and to explicitly affirm that the submission of AB 691 plans by those jurisdictions will satisfy the requirement of the RSAP.

Thank you for your acknowledgement of the jobs and existing industry that are water-dependent uses that are the backbone of the Bay Area economy and facilitate access to essential goods and commerce.

Sincerely,



Mike Jacob
President

cc: Larry Goldzband, Executive Director

COMMENT #226

PDF – PG&E

October 17, 2024

San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105

Submitted via: publiccomment@bccdc.ca.gov

RE: Comments on the Draft Regional Shoreline Adaptation Plan

Pacific Gas and Electric Company (PG&E) appreciates this opportunity to comment on the Draft Regional Shoreline Adaptation Plan (RSAP). The RSAP guidebook successfully provides clear steps for cities and counties to create plans for addressing the physical impacts of climate change while keeping equity at the forefront. PG&E looks forward to further collaborations with State, regional, and local partners to effectively manage climate risk consistent with PG&E's goals to serve people, the planet, and California's prosperity. Below are PG&E's detailed comments:

Deadlines related to SB 272: Local governments in the State's coastal zone to address sea level rise by January 1, 2034.

The State's requirement for local governments is to have a plan that addresses sea level rise available in 10 years. Due to the increased risk of sea level rise (SLR), PG&E recommends that the RSAP is more deliberate to encourage the creation and adoption of local plans on a shorter timeline. SLR has already increased by four inches since 1993¹ and is expected to rise another 4 – 8 inches by 2050.² The cost of delaying action could put many areas at risk within the next 10 years as some areas have already experienced coastal erosion and impacts of flooding during storms. PG&E is better able to partner with local communities and support their energy-related resilience needs when communities have an existing plan in place. This also increases the potential for partnered resilience grant applications like PG&E's matching funding for the San Francisquito Creek Joint Powers Authority SAFER Bay³ FEMA/BRIC grant discussed below.

Section 3.2.2 Minimum Categories and Assets Standard

PG&E recommends that electric and natural gas facilities be considered as a Strategic Regional Priority and that submitted plans demonstrate coordination with local utilities. PG&E assets are located within local communities and often along the Bay shoreline and we would like to partner with local governments on mutually beneficial resiliency projects, as we have with the SAFER Bay Project. For this project PG&E partnered with the City of Menlo Park, the San Francisquito Joint Powers Authority, and Meta, to earn a grant from the Federal Emergency Management Administration's Building Resilient Infrastructure and Communities program. This grant seeks to protect critical infrastructure and communities from flooding associated with sea-level rise. PG&E was able to catalyze an existing community resilience project and contribute to the

¹ [Climate Change: Global Sea Level | NOAA Climate.gov](https://www.noaa.gov/climate/global-sea-level-rise)

² [U.S. Sea Level Change](https://www.noaa.gov/climate/sea-level-rise)

³ <https://www.sfcjpa.org/safer-bay-project>



protection of both the surrounding community and the energy infrastructure serving that community. Additionally, physical infrastructure projects along the Bayshore will likely require coordination to manage impacts to existing energy infrastructure. PG&E reiterates its recommendation to elevate electric and natural gas facilities to Strategic Regional Priorities in the plan to facilitate better coordination among stakeholders and streamline resiliency and adaptation work needed along the shoreline.

Conclusion

PG&E again expresses appreciation for the opportunity to comment on the Draft RSAP and commends the efforts of all involved for coming together to address the climate-driven threat of sea level rise in the Bay in a holistic and coordinated manner. Resilience is a shared goal, and this effort appears to be a strong step in bringing stakeholders together to achieve it.

Sincerely,

Patrick Moore | Climate Resilience Principal - PG&E

415.603.0763 | Patrick.Moore@pge.com

COMMENT #227

Kenneth R. Schreiber
31 Ludina Way, Redwood City, CA 94061
Cell (650) 269-2341
krsplan@mindspring.com

October 17, 2024

To: BCDC

From: Ken Schreiber

Subject: Comments on Draft Regional Shoreline Adaptation Plan Guidelines

I was Palo Alto's Director of Planning and Community Environment from 1981 to 1998 and managed development and initial implementation of the Santa Clara Valley Habitat Conservation Plan/Natural Communities Conservation Plan from 2004 to 2014. My comments on the Adaptation Plan Guidelines are from the perspective of managing large scale land use-related planning projects involving significant technical and policy complexity and substantial public participation.

Summary of Recommendations:

A-1: BCDC's General Counsel should provide written guidance regarding the application of CEQA to both adoption of Subregional (local) Adaptation Plans and adoption of BCDC's Bay Area Adaptation Plan. If CEQA applies to Subregional (local) Plan adoption and/or BCDC adoption, revise the Guidelines to reflect both this major work component and how CEQA compliance impacts meeting the January 1, 2034 deadline in SB 272. Note that if CEQA applies to Subregional (local) Plan adoption and/or to BCDC Bay Area Plan adoption, the timing recommendations B-3 and B-4 and my suggested modifications to the Executive summary (item G) are likely to change.

B-1: Identify in the Guidelines an annual concise RSAP status report from each jurisdiction.

B-2: Clarify the Guidelines to identify whether the SB 272 January 2034 deadline can be extended.

B-3: Establish January 1, 2033 as the deadline for submission of Subregional (local) plans.

B-4: Identify 2033 as the time for BCDC review of Subregional (local) plans and resolution of cross jurisdictional consistency issues and establish January 2034 as the deadline for achieving adoption of both Subregional Adaptation Plans and an integrated Bay Area Regional Shoreline Adaptation Plan.

B-5: Consider if BCDC should initially receive Final Draft Subregional Plans rather than adopted Subregional Plans.

B-6: Add SB 272 to the Regulation's attachments.

C-1: Focus the Guidelines on impacts of and actions needed to address +3.1-foot of sea level rise by 2100 with identification of actions needed to address a 2050 +0.8-foot sea level raise and a narrative description of the implications of the +6.6-foot 2100 sea level rise scenario.

D-1: Using the Adapting to Rising Tides work and other technical information, modify the Guidelines to identify locations where multi-jurisdiction planning is necessary to address hydrological and/or other issues associated with rising water levels.

E-1: BCDC, working with other regional agencies, should identify larger scale infrastructure that is not under the control of a local jurisdiction(s) and establish sea level rise planning expectations that support SB 272.

F-1: Incorporate into the Guidelines analysis of subsurface permeability to determine areas where traditional barriers/levees will not, at an identified level of sea rise, provide protection from rising water levels and areas where rising water including impacting natural solutions to sea level rise.

G-1: Reorder the Draft Executive Summary to place at the beginning the key information of most importance to first-time readers and local decision makers.

Details Related to Recommendations

A. Environmental Review

I could not find any references in the Guidelines to environmental review (compliance with CEQA). SB 272 has no wording addressing environmental review of approval of either a Subregional (local) Shoreline Plan or BCDC's Bay Area Shoreline Adaptation Plan. I am not sure if BCDC has exemptions from CEQA but (note that I am not an attorney) I am not aware that local jurisdictions would have an exemption for a Subregional Plan. My experience and assumption is that local government adoption of the first discretionary action associated with future discretionary actions that require CEQA review triggers CEQA review of the initial decision. Subregional (local) Adaptation Plans will need to identify future discretionary actions (e.g., General Plan amendments, public works projects, area specific building removal regulations) that will require CEQA review.

If a Subregional (local) Shoreline Adaptation Plan needs CEQA review and, even worse, if both local and BCDC adoption actions need environmental reviews for approving their Adaptation Plans, that would add a substantial work component to the Guidelines and add a major time component to Plan preparation. My comments below regarding Timeframe do not include conducting CEQA review(s).

Recommendation:

A-1: BCDC's General Counsel should provide written guidance regarding the application of CEQA to both adoption of Subregional Adaptation Plans and BCDC's Bay Area Adaptation Plan. If CEQA applies to Subregional (local) jurisdiction adoption and/or BCDC adoption, revise the Guidelines to reflect both this major work component and how CEQA compliance impacts meeting the January 1, 2034 deadline in SB 272. Note that if CEQA applies to Subregional (local) Plan adoption and/or to BCDC Bay Area Plan adoption, the timing recommendations B-3 and B-4 and my suggested modifications to the Executive summary (item G) are likely to change.

B. The Timeframe for Development of Subregional (local) Plans

Preparation of Subregional (local) plans will need to integrate complex technical issues and modification of public policies within a process assumed to have significant public participation. To create a Bay Area

Adaptation Plan, BCDC will have to evaluate individual plans for consistency with the Plan preparation Guidelines including consistency across jurisdiction lines and, in some situations, consistency within larger hydrological areas.

From the perspective of a local jurisdiction's management staff as well as some elected officials, the January 2034 deadline under SB 272 is a long way into the future. For a variety of staffing, budgeting and potentially difficult public policy issues, some jurisdictions will delay starting work on their plan.

As January 2034 approaches, it is likely that BCDC will receive requests for extending the submittal time for some Subregional (local) plans and other Subregional (local) plans will be sent to BCDC in very late 2033. The Regulations should address the potential for BCDC to extend the State's January 2034 deadline.

The Plan development, review and approval process should allow for orderly BCDC review of Subregional (local) Plans and resolution of conflicting issues that cross jurisdictional lines in order to have a unified Bay Area Shoreline Adaptation Plan. Thus the timeline for preparation of Subregional (local) plans needs to allow time for BCDC review and addressing both jurisdictional issues and cross jurisdictional/multi-jurisdictional issues. At least a year should be allocated to the BCDC review process and thus Subregional (local) Plans should be submitted to BCDC by no later than January 2033.

An associated issue is whether BCDC receives Subregional (local) adopted Plans or Final Draft Plans. The advantage of BCDC receiving Final Draft Plans is that it acknowledges BCDC's responsibility to confirm that Subregional (local) Plans are consistent with SB 272 and BCDC's Guidelines. Also, adjusting a local Plan is easier if the Plan is in Final Draft form rather than adopted.

Another issue is whether the Guidelines should acknowledge a future review process for implementation of adopted Subregional (local) Plans and if so, when reviews will happen.

Recommendations:

B-1: Require an annual concise RSAP status report from each jurisdiction.

B-2: Clarify the Guidelines to identify whether the SB 272 January 2034 deadline can be extended.

B-3: Establish January 1, 2033 as the deadline for submission of Final Draft local plans.

B-4: Identify 2033 as the time for BCDC review of Subregional (local) plans and resolution of cross jurisdictional consistency issues and establish January 2034 as the deadline for adoption of Sub-regional (local) Plans and approval of the Bay Area Regional Shoreline Adaptation Plan.

B-5: Consider if BCDC should initially receive Final Draft Subregional Plans rather than adopted Subregional Plans.

B-6: Add SB 272 to the Regulation's attachments.

C. Focus the Plan Preparation on a 2100 Sea Level Rise Number

Sea levels are rising at an accelerating rate. From a planning perspective, 2050 is a point in time that doesn't address the extent of rising levels of water that many Bay Area residents will experience in their lifetimes. For some, focusing on 2050 will be the easier path that can minimize addressing more difficult decisions associated with higher water levels in 2100.

For 2100, the Guidelines have three scenarios---+3.1 feet, +4.9 feet and + 6.6 feet. While personally I would focus on the +4.9 feet and +6.6 feet scenarios, I conclude that the public process will function better with a focus on the +3.1-foot scenario with identification of actions to be accomplished by 2050 and a Plan narrative description of the +6.6-foot scenario.

Recommendation:

C-1: Focus the Guidelines on impacts of and actions needed to address +3.1-feet of sea level rise along with identification of actions needed to address a +0.8-foot sea level rise by 2050 and a narrative description of the implications of the +6.6-foot 2100 sea level rise scenario.

D. Multi-jurisdiction Shoreline Planning

There are some locations where effective planning for rising water will, because of hydrological, infrastructure and/or other issues, require multi-jurisdictional planning. Having Subregional (local) plans address multi-jurisdictional issues will also help BCDC achieve an internally consistent and integrated Bay Area Shoreline Adaptation Plan.

Recommendation:

D-1: Using the Adapting to Rising Tides work and other technical information, modify the Guidelines to identify locations where multi-jurisdiction planning is required to address hydrological and/or other multi-jurisdictional issues associated with rising water levels.

E. Addressing larger area infrastructure that is beyond the control of individual jurisdictions

There are two parts to this issue: 1) infrastructure provided by special agencies with an elected Board of Directors (e.g., some Sanitary Water Treatment agencies) and 2) larger area infrastructure controlled by non-local agencies/organizations (e.g., Highway 101 from San Jose to San Francisco, railroad tracks located close to shorelines). While apparently outside of the SB 272 regulations, addressing these facilities is integral to local and regional planning for responding to rising water.

Recommendation:

E-1: BCDC, working with other regional agencies, should identify larger scale infrastructure that is not under the control of a local jurisdiction(s) and not subject to SB 272 and establish sea level rise planning expectations that support SB 272.

F. Rising Groundwater

The Guidelines identify addressing the impacts of Shallow Groundwater and Groundwater that has reached the surface. Traditionally, responding to rising waters has focused on use of natural (green) solutions and built barrier (gray) solutions. Significant parts of the Bay shoreline rest on top of permeable subsurface material with some locations having a depth of 100 or more feet of permeable material. New barriers placed on top of permeable material may protect against storm surges and unusually high waves but in some and perhaps many locations will not protect against rising water. Rising water will flow through underlying permeable material and establish an equal height on either side of the barrier.

I believe that for many members of the public and some local jurisdiction staff, the focus is still on green versus gray responses to rising water without recognizing potential impacts of subsurface permeable material

Recommendation:

F-1: Incorporate into the Guidelines analysis of subsurface permeability to determine areas where traditional barriers/levees will not, at identified levels of sea level rise, provide protection from rising water levels including impacting natural solutions to sea level rise.

G. Modifications to the Executive Summary

I read the Executive Summary from the perspective of what information would be the most important to have in a City Council staff report. What I would want to communicate are:

- Our jurisdictions has to comply with a 2023 State law (SB 272)
- The law requires BCDC to develop guidelines and regulations intended to both have each local jurisdiction comply with the law and have a consistent Bay Area response to the law.
- Complying with BCDC's role in the State law means local jurisdictions directly impacted by rising water must undertake a complicated technical, public policy and public participation process. Our jurisdiction has the resources to address many issues but we will need outside assistance to address the following issues: _____.
- We will need to work with the following jurisdictions/agencies/organizations to address some of the issues associated with rising water.
- The rising water levels that need to be addressed are in the following table (using the table on page 127 of the Draft Regulations)
- The timeline we need to meet is submission of our Plan by January 1, 2033 but given the complexity, we should not delay the work. To initiate the work, direct staff to prepare a scope of work including a timeline and an initial estimate of the amount of needed staff resources, the areas of technical and other expertise needed to supplement staff resources and a public participation process including what advisory groups should be involved (e.g., Planning Commission, Parks and Recreation Commission, certain neighborhood associations, etc.).

Many readers will read the Executive Summary and Introduction and not read the details.

To address the key issues that are of most importance to many readers and assist understanding of the Guidelines, the following modifications to the Executive Summary are suggested.

- Keep the bold text at the start of the Draft Executive Summary.

- The first paragraph should be the 1st paragraph at the top of page 3 of the Draft (As of Autumn 2023 ...)
- The second paragraph should be the following paragraph on page three but change the heading to **SB 272**
- The next section should be the five paragraphs on page 5 of the Draft headed **The Guidelines ...**
- The next section should be a brief description of why certain water levels need to be analyzed including incorporating the table on page 127.

The remaining Draft Executive Summary text includes valuable supporting information but that text should support the key points rather than having the key points scattered within the Executive Summary.

Recommendation:

G-1: Reorder the Draft Executive Summary to place at the beginning the key information of most importance to first time readers including local decision makers.

COMMENT #228

PDF – Richmond Southeast Shoreline Area Community Advisory Group

October 17, 2024

San Francisco Bay Conservation and Development Commission

Re: BCDC Regional Shoreline Adaptation Plan (RSAP): One Bay Vision

Thank you for the opportunity to comment on this Regional Shoreline Adaptation Plan. For the last 20 years the Richmond Southeast Area Shoreline Community Advisory Board to the Department of Toxic Substances Control has advocated for the effective cleanup of more than two dozen contaminated sites in Richmond along the San Francisco Bay.

As a group we have gained hard won knowledge of complicated legacy pollution in our community, historical treatments of waste, changing regulations, guidelines and approaches to restoration and development of our shoreline.

Sea level rise scares us and we are particularly concerned with the threat of contamination from toxins buried in the soil spreading through sea water and groundwater. While we welcome BCDC's efforts in addressing some of these concerns in this plan, we frankly remain skeptical and concerned about preservation of human and environmental health. We want comprehensive identification of contaminated areas, effective clean ups, and systematic coordination among the regulatory agencies whose job it is to protect us.

Time and time again our fears are minimized and the scope and complexity of the contamination is not recognized. As an example, the former Stauffer Chemical plant (Zeneca Site) has 500,000 cubic yards of known toxic materials buried in an unlined hole, with just a temporary cap on top; it has been in place for 18 years. There are acres of other partially-remediated former chemical evaporation ponds and extensive pollution from heavy metals, pesticides and herbicides left in place at the edge of the shoreline.

Thousands of tons of waste materials, some containing radioactive materials, were dumped in the Blair landfill that has not been characterized. Plumes of contaminated groundwater have flowed to neighboring properties and into the marsh and Bay. DTSC and independent agencies have acknowledged contamination in the marsh. Yet they have failed to fully characterize the area and clean it up.

Sea level rise poses new threats to this very complex situation. Reasons include:

- rising water will cover the contaminated materials and limit the ability to remove them
- saltwater changes the chemical impact of the contamination
- saltwater aids the spread of the contamination
- sea water pushes up groundwater and brings the contamination to the soil surface

October 17, 2024

Addressee: BCDC Regional Shoreline Adaptation Plan (RSAP): One Bay Vision

Although the Plan mentions Environmental Justice communities, it neglects their lack of resources to solve these problems on their own. We need coordinated regional and statewide support to enhance equity and justice in contamination response. A true Regional Plan must include standards and requirements to ensure that coordination and BCDC needs to strengthen their public participation practices.

Sincerely,

/electronic signature/

Maggie Lazar
Chair
Richmond Southeast Shoreline Area Community Advisory Group

COMMENT #229

PDF – Oakland Alameda Adaptation Committee



Oakland Alameda Adaptation Committee

San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105

October 17, 2024

RE: Public Comment on Item 8, [Public Hearing on the Regional Shoreline Adaptation Plan \(Bay Plan Amendment No. 1-24\)](#), October 17, 2024

Dear Commissioners,

The City of Alameda, City of Oakland, and Port of Oakland are pleased to submit comments on behalf of the Oakland Alameda Adaptation Committee (OAAC) on the Public Draft Regional Shoreline Adaptation Plan (RSAP) guidelines that will be used by local jurisdictions to develop subregional adaptation plans that meet the requirements of Senate Bill 272 (Laird 2023).

Since 2021, the OAAC has been convening as a coalition of shoreline communities and stakeholders working to accelerate sea level rise adaptation, protect and restore water quality, habitat and recreation, and promote community resilience. OAAC has received funding from the National Fish and Wildlife Foundation and the San Francisco Estuary Institute to develop a long-term Subregional Adaptation Plan that details preliminary strategies and pathways for shoreline communities to take as the climate and shorelines change over time. We are developing this plan in parallel to the development of the RSAP guidelines and intend that the OAAC adaptation will meet the requirements of SB 272.

We previously provided detailed comments in June 2024 on the Version 1 draft of the guidelines. We appreciate BCDC's responsiveness to many of the comments we submitted. Overall, we feel that good progress has been made with the Public Review Version 2 of the draft guidelines



published in September 2024. However, we remain concerned that the following significant issues have not yet been addressed:

Statutory Authority. The proposed plan seeks to establish oversight/approval of many local government services and decisions by BCDC. The RSAP guidelines require local government decisions on land use, transportation, infrastructure, and more to be provided in tremendous detail, suggesting that approval of strategies for sea level rise planning may be contingent on BCDC staff making determinations about whether such local government decisions are consistent with other jurisdictions. It is critical that BCDC clarify the standards by which these Subregional Plans will be reviewed and approved, as well as clarify that decisions required by law to be made by locally elected officials are not subject to review by BCDC as part of the RSAP.

Simplify requirements. The proposed plan requires extensive detail and substantial resources for local jurisdictions to develop. SB 272 specifically calls for sea level rise adaptation in the Bay Area to be based on the Bay Adapt Guiding Principles, to “support existing efforts while planning for the long term,” and to “pick the right strategy at the right time.” This requires ensuring that local and regional investment strategies are place based, grounded in local needs, conditions, and plans, and phased to allow for uncertainty, flexibility, and iteration. We are concerned that this exhaustive new process with significant detailed planning requirements will take away resources and time for much needed implementation of adaptation measures which does not fully account for various planning work already undertaken at the local level.

We request BCDC simplify the requirements such that local jurisdictions have greater flexibility to align RSAP planning efforts within their existing planning and community engagement processes (including General and Specific Plans, Local Hazard Mitigation Plans, and Resilience strategies) and respond to local needs. For example, BCDC could provide greater flexibility, clarify requirements, address inconsistencies, reduce the level of detail required and focus on key requirements. In addition, BCDC should also not require that Cities should update existing plans, studies, and data to be compliant with the RSAP

Coordination and consistency with State Priorities. We have concerns that the provisions of the RSAP may conflict with those of other State agencies such as the Office of Planning and Research (OPR), California Department of Housing and Community Development (State HCD), Office of Emergency Services (CalOES), Department of Transportation (CalTrans), Department of Forestry and Fire Protection (CalFIRE), and more. The guidelines suggest that details of the emergency management, housing, transportation, and other services may impact the approval of the Subregional Plans.

As an example, one of the core requirements from State HCD in creating the City’s Housing Element was to reduce constraints on housing, it appears these requirements could add many

additional constraints on housing and may affect a city's ability to meet their Regional Housing Needs Allocation (RHNA) goals. If the City adopts these requirements, could State HCD find a city to be not in compliance with their Housing Element? We would like to understand how BCDC has worked with the State HCD to ensure consistency between Housing Element and RSAP requirements since cities are beholden to meeting State HCD requirements and are subject to penalties if they are not met.

Shoreline jurisdiction.

We are concerned that the draft RSAP guidelines hold cities and counties responsible for developing action plans for shoreline areas outside their jurisdiction and/or where the shoreline is managed by other agencies (federal and state governments, parks districts, Ports, etc.) or private landowners and these asset owners are not required to develop plans to address sea level rise (C2). While coordination among parties will occur in the development of Subregional Plans, this disconnect creates a challenging scenario that requires all parties to agree on details of how to manage land uses and infrastructure near the shoreline, including land use and economic strategies, and no way forward if an agreement cannot be reached. Putting all the burden on cities without equal responsibility on asset managers is inequitable to communities. We request that BCDC direct staff to clarify the role that the RSAP and subregional plans will play when managing these issues.

We have provided detailed comments on the Version 2 draft of the Guidelines in the attached. We urge you to request that BCDC staff address these concerns in the final RSAP guidelines.

Sincerely,

Signed by:

645BD87E45D243E...

Jennifer Ott, City Manager
City of Alameda

Signed by:

3806FD91919044D...

Justin Johnson, City Administrator
City of Oakland

DocuSigned by:

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Danny Wan, Executive Director
Port of Oakland

Oakland Alameda Adaptation Committee

RSAP Guidelines Version 2 Comments

October 17, 2024

General

Plan Elements						
Element A: Planning Process	Element B: Existing Conditions	Element C: Vulnerability Assessment	Element D: Adaptation Pathways	Element E: Land Use and Policy Plan	Element F: Project Implementation Plan and Funding Strategy	Element G: Project List

- Overall, what is being called for is an extremely detailed plan that will require significant resources and cost to develop. Recognizing that there are limited funds available for adaptation planning and implementation, we suggest simplifying requirements where possible, focusing on only the highest priority actions, reducing the number of required planning scenarios and greater alignment with existing plans. The plan should be high level and recognize that greater detailed plans will be provided as plans progress into projects. Jurisdictions need greater flexibility to plan in the way that works for them and aligns with their existing planning efforts.
- Recommend allowing for (or encouraging) BCDC review and (conditional) approval of elements incrementally as they are completed. This would reduce the potential for rework if a local jurisdiction or lead agency heads down an incorrect path.
- If all elements are submitted at once, the resulting Plan document would include a substantial amount of content. Local jurisdictions or submitting entities may want to create a high-level overview of the Plan for community outreach purposes, and to brief decision makers and elected officials. Alternatively, the Plan could focus on the most important findings for each element, with each element serving as an appendix to the Plan.
- Elements E and F are very important to adaptation planning and should remain in this document. However, BCDC may wish to consider whether exceptions can be made in how detailed / how decisional this document is with respect to land use changes, implementation, and funding/financing.
- Editorial comment, but important to the document’s foundation: The plan is referred to as a “resiliency” plan and an “adaptation” plan. Recommend clarifying which this intends to be, as the terms are not synonymous though highly related and complementary. Presumably a resiliency plan would include elements beyond sea level rise adaptation.

Section 1: Introduction

- Section 1.1 Please further explain the assessment that “Many Bay shoreline cities and counties have not planned for and are not prepared for its impacts.” We are concerned that BCDC is using as its base assumption a low level of planning across the Bay Area and take issue with the fact that assessment, knowing that many jurisdictions have done or are in the process of completing adaptation plans. We believe the assumption of a low level of planning may be part of the reason that the guidelines are so detailed and specific.
- Section 1.4.2: Recommend adjusting the definition for adaptation pathways:
 - Suggested definition: An adaptation pathways approach helps decision makers understand how near-term actions implemented today may affect future adaptation actions implemented by the next or future generation. An adaptation pathway is comprised of discrete, manageable actions that can be sequenced over time. The timeline for implementing the actions will vary as sea level rise and flood risks change over time, and the actions may require modification to meet future societal goals and changing physical conditions. Robust adaptation pathways consider more than one potential long-term future and maximize adaptability to provide future generations with flexibility. Pathways rely on developing triggers and decision points and monitoring the effectiveness of strategies and changing physical and social conditions that signal when changes to the pathways need to occur.
 - For context, this is the RSAP Sept draft definition: Adaptation pathways means developing adaptation strategies comprised of discrete, manageable steps that can be sequenced and adjusted as sea levels rise and risk changes over time. Pathways rely on developing triggers and decision points and monitoring the effectiveness of strategies and changing physical and social conditions that signal when changes to the pathways need to occur.

3.4.1 Local Government Planning Responsibilities

- We appreciate the clarification that local governments are encouraged, but not required to participate in both a local or subregional shoreline plan and a county plan. This reduces duplication of work.
- We appreciate the clarification that local governments are only required to make their best effort to engage with other entities such as special districts who are not required to develop plans for lands that they own. We also appreciate that BCDC seeks to support local jurisdictions to engage with these entities, especially ones that may be involved in many planning processes (i.e., Caltrans, EBRPD, etc.). For local governments that have large portions of their shoreline under the control of another jurisdiction with land use authority on the shoreline, such as the Port of Oakland in our region, requiring the City to adopt the Plan, while most of the requirements will fall on another agency, create complexity and may not result in comprehensive planning across jurisdictions.

3.4.2 Submitting Plans and Getting Approval

- Data submittal: Depending on what is required, many jurisdictions have data layers that are sensitive in nature and cannot be shared. Or in other cases, data layers are constantly being

refined and updated through other processes (e.g., stormwater systems), so submitting the data to BCDC could result in data confusion between this and other efforts.

- Data verification: Recommend revisiting the data verification process. It appears quite strict, given that much of the Element B and C efforts may have been completed before the BCDC RSAP data and guidelines were available.
- We appreciate that BCDC is no longer requiring local jurisdictions within a county to submit their plans to BCDC together, however this is still strongly encouraged and we remain concerned that it would be extremely challenging to get this timing right across the whole county. We suggest that it should be sufficient for the local government to have engaged with their neighboring local government or subregional area to ensure consistency at the boundaries of the planning area.
- Recommend adjusting the header of “Submittal Requirements,” as the item included is encouraged (not required).
- Recommend BCDC consult with local staff regarding the requirements for initiating the planning process to develop a plan. Some jurisdictions have already taken steps to initiate the process.

3.1 Subregional Plan Elements

- Recommend the following, at least for the first submission, to avoid rework for jurisdictions that have advanced adaptation efforts ahead of the RSAP process.
 - Relax the “best available data” requirements across all elements to allow for the best available data at the time of analysis. Substantial efforts have already been conducted at multiple levels within and across jurisdictions, and it is inefficient to exhaust resources to update them with different datasets at this time.
 - Relax the outreach-related equity assessment requirements. For the first submission, the equity assessment can call out where past efforts did or didn’t align with the desired process and describe how we address the shortcoming now, but we can’t change activities from the past.

Element A – Plan Requirements

- A1-b: Recommend reflecting on the role of jurisdiction leadership (councils, boards of supervisors) in the process, encouraging jurisdictions to bring leadership along throughout the plan development as they must eventually pass a resolution to approve the Plan. Recommend providing greater flexibility for jurisdictions to decide which departments and agencies and stakeholders should be included in the project team. The list provides helpful suggestions but shouldn’t be a required list.
- A2-a: Recommend using the SFEI Atlas OLU boundaries as the inland boundary. This considers coastal flooding, but a smoother project area boundary than using flood hazard layers directly. However, we do note that this boundary is static and does not consider future changes in the sea level rise science and other available data that are likely to occur before 2034. The SFEI Atlas could be updated to reflect these changes over time.

Element B – Existing Conditions

- B1 (existing plans, studies, etc.): Recommend reducing the level of detail required. The overarching requirement is reasonable, but the 7 sub-bullets requiring distinct summaries and multiple long lists of the types of documents that appear required for inclusion is excessive, especially when considering the desire to encourage multi-jurisdictional planning processes. Recommend keeping the overarching requirement, but making all sub-bullets suggested for consideration. Trust the jurisdictions to identify the level of detail necessary to support good planning based on their local circumstances.
- B1-g: This item may be challenging at the existing condition stage of the process. Barriers and conflicts often arise during the later elements in the workflow outlined by BCDC.
- B2 and B3 (existing conditions physical characteristics and mapping, etc.): As noted above – recommend relaxing specific dataset requirements (at least for first submission, especially for analysis conducted before guidelines released/finalized) and clarifying the level of detail of the requirement (if the submittal checklist text is the “requirement” – that seems reasonable – if it’s every comment listed in the sub-bullets of B2 and B3, it may be excessive).
- B3.a Mapping Requirement: requires mapping of tribal resources, however this information is considered proprietary, sensitive and confidential.

Element C – Vulnerability Assessment

- Recommend re-naming this element to “Exposure, Vulnerability, and Consequences Assessment”.
- Level of detail, specific datasets, and approach to identifying priority action areas for exposure and vulnerability assessment is challenging to meet.
- C1: Recommend reducing the prescriptive language and focusing the requirements on what is most important. Aiming to avoid duplicative maps and text (e.g., **28 categories x 4 time horizons x 3 hazards = 336 maps** and descriptions, many of which will be nearly identical).
- C1-a: We appreciate that the number of sea level rise scenarios has been reduced to four, however we remain concerned that jurisdictions will be extremely challenged to plan out to 2100 because the scale of change required is so drastic and the uncertainties so large. Suggest requiring planning to 2050, 2100 INT and INT-HIGH scenarios, with 2100 HIGH as optional.
- C1 (exposure): Recommend adjusting the wording of C1b to indicate that these are suggested considerations (currently they appear to be an additional sub-checklist of required items for inclusion).
- Section C1-a and Table 3-1 require a summary of exposure of all assets in the Minimum Categories and Assets to the required 0.8 ft (2050), 3.1 ft (2100 INT), 4.9 ft (2100 INT-HIGH), and 6.6 ft (2100 HIGH) sea level rise scenarios. However, Section C2.a only requires mapping of assets and areas of significance that are exposed to the 0.8 ft scenario (2050) as a priority and minimum required for the Vulnerability Assessment while Section C4.b requires a summary of vulnerability for each reach and Table 3-1 lists all the sea level scenarios as required to be completed as part of Element C and three scenarios for Element D, section D2.a, in addition to conceptual designs.

- C2 (vulnerability assessment and identification of priority action areas): Recommend conducting the vulnerability assessment at the study-area scale, with high-level asset-specific (or asset category-specific) findings for sensitivity and adaptive capacity. If there are specific “areas of significance” that require a more detailed approach, the jurisdiction (or group of collaborating jurisdictions) could include additional information / context as appropriate and available or identify it as a study needed to guide future efforts. This may help reduce duplication and maintain a reasonable level of detail. Note: In the first round of submissions, few assets may have adaptive capacity as they were designed for a static climate. The study-area scale assessment will allow the jurisdiction to identify priority action areas that require additional investment (of time, resources, additional study, and/or adaptation). The selection of priority action areas should include community input. In some cases, a single asset (e.g., BART, wastewater treatment plant) may drive the selection of priority action areas; in other areas the selection is more nuanced and may require consideration of asset interdependencies and cascading consequences.
- C2: Recommend reviewing the definition of “high priority assets and areas” – it is in part defined by the vulnerability and consequences of assets/areas, but the process suggests that the vulnerability and consequences haven’t been assessed until after the high priority assets and areas are determined. Suggest that assets could be taken from LHMP.
- C2-b, C2-c: Clarify the distinction in requirements and level of detail for vulnerability analysis for the planning area and priority action area under C2.b and C2.c. Clarify the criteria used to determine if assessment of additional vulnerability factors for assets and areas of significance.
- Incorrect reference in C2.c. C2.c references C2-1 which is incorrect. The correct reference is C2.a.
- C3 (cost of inaction): Recommend BCDC develop information / analysis to support the damage costs related to critical infrastructure for regional assets.
- C4 (shoreline reaches): Recommend considering where you can reduce requirements / detail in C4b and C4c, as both are re-organizing information that has already been captured at a different geographic scale.
- C4 (shoreline reaches): Recommend removing “phasing” from the title of C4.

Element D Adaptation Strategies and Pathways

- Recommend clarifying/revisiting the definition of adaptation pathways. The adaptation pathways approach is about enabling options for a future generation(s) to implement. Building in the ability to adapt a project to higher rates of sea level rise, if needed, and ideally not locking future generations into a single future pathway. The way it reads now, it sounds more like a series of predefined actions phased over time. An adaptation pathway approach should allow for more than one possible future.
- D3 (evaluation): Recommend indicating in the text that the level of evaluation and decision-making may be different for different timescales / SLR scenarios.
- D4-a: The number and specificity of adaptation strategies required is much too great to include in an overall plan and may not be feasible or desired at this stage for 2100 given the significant uncertainty and unknowns associated with planning that far out. At the later time horizons, the plan should provide considerations for future planners and decision makers without being definitive and locking in decisions before we have all the information. The requirements for priority actions areas are extremely detailed and it may be a better use of resources to include the greater

level of detail in a specific plan at a later date when project level planning for this area is ready to get underway.

- D4b (adaptation pathways): Recommend adjusting the text – phasing of adaptation strategies isn't quite the same as an adaptation pathways approach. Phasing is typically a linear set of steps over time; the adaptation pathways approach allows for flexibility in both timing and the “steps” or action themselves, to avoid “locking” future generations into the decision of today.
- Reduce level of specificity required in D2, D3, D4. The RSAP requires identification of preferred adaptation strategy approach for each shoreline reach at the required 0.8 ft (2050) and 3.1 ft (2100 Intermediate) sea level rise scenarios. Requiring jurisdictions to choose one preferred pathway will limit flexibility in the planning process given the limited availability of information, and our current knowledge. A long-range plan such as the RSAP needs to provide jurisdictions the flexibility to identify multiple adaptation pathways, to account for the uncertainties and availability of new information. D2 and D4 have some duplication that may not be necessary
- Define Non-Priority or Outside Priority Action Areas. Section D4.a requires a narrative description of adaptation strategies in non-priority or outside priority action areas. How are these defined?
- Missing sections
 - D4.c provides a reference to Section 3.6.3. and a template with Matrix of Adaptation Standards. This section is missing.
 - D6 is referenced but it is not a described task within the document.

Element E – Land Use and Policy Plan

- E1 (land use and policy changes): Recommend clarifying the language to indicate whether these are existing or new policies/programs (We assume the intent is new policies or policy updates).
- E1-a: Description of land use and zoning changes should be kept general and high level and include options for future consideration and needs to provide jurisdictions with the flexibility to account for community feedback. We cannot commit to land use changes that have huge political and financial implications. Decisions about land use changes will need to be made along with changes to zoning and General Plans and include considerations and tradeoffs about shoreline protection vs land use change. Land use changes are enacted by the City Council and the RSAP should not require Cities to commit to land use and zoning changes without community consensus and Council direction.

Element F – Project Implementation Plan and Funding Strategy

- The RSAP requires a description of high-level costs of projects and identification of funding sources while also acknowledging the ever-evolving nature of adaptation. Providing high-level cost estimates for potential projects under multiple adaptation pathways is not feasible.

3.2 Minimum Standards and Recommendations

3.2.1 Coastal and Flood Hazard Standards

- Recommend making wave runup required. The Plan can rely on existing FEMA wave runup analysis or more detailed local-scale modeling to understand the existing wave climate and the potential for wave runup on existing structures. Shoreline adaptation strategies in areas with higher wave energy will require wave runup analysis to ensure they can mitigate future wave hazards.
- Recommend putting more emphasis on the mid-term for this document and reducing emphasis on “short-term” and “near-term” strategies (designed to be implemented in the next 10 years). Some smaller projects or urgent repairs may make sense to design for the short-term, but most reach- and subregional-scale strategies should be geared toward the mid-term. The design and implementation process can take many years, and the lifespan of the improvements could be 50 years or longer, which places most projects in the “mid-term” timeframe. Immediate or “short-term” projects can address existing risks while a larger-scale project is designed and permitted, and funding is lined up for implementation.
- Recommend a footnote clarifying that the 3.5’ 100-year storm surge from AECOM 2016 is intended for high-level planning purposes and should not take the place of site-specific hydrodynamics modeling or engineering analyses. This note is included in AECOM 2016 but is often overlooked.
- Recommend changing this text: “We recommend use of one of two hydraulic models that exist regionally for the Bay; USGS’s Our Coast our Future or SFEI’s Shallow Groundwater Response to Sea Level Rise.” To this: “We recommend using of one of two datasets that exist regionally for the Bay; USGS’s Our Coast our Future or Pathways Climate Institute and SFEI’s Shallow Groundwater Response to Sea Level Rise.”

Section 3.2.2 Minimum Categories and Assets Standard

- Recommend adding flexibility to this standard (Minimum Assets and Categories), similar to the adaptation strategy matrix (D4c) – a mechanism by which plan-preparers can indicate what has been included and give reasons for omitting some assets.

3.2.3 Equity Assessment Standards

- The equity assessment standards are extremely detailed and prescriptive and do not allow for sufficient flexibility for local governments to be responsive to local needs and planning processes. Recommend reducing the number of required elements and providing recommendations for best practice approaches to achieving the standard. Recommend converting this to a series of *recommended* questions (not requirements) to ask of the project team during the strategy development process
- The assessment requirements have redundancies with information that has been collected through local planning efforts. Information cities have already gathered from community input from plans such as a Safety Element, Environmental Justice Element, Specific Plan, Equitable Climate Action Plan, etc. should be allowed as part of the public input. To not allow use of this

information already gathered may lead to more mistrust from the community that the City is not using the valuable information that the community took time to give and lead them to question why the City is asking for this same information again. The City should be allowed to build upon this existing information, not have to start from scratch. Rather than a one size fits all approach that leans towards overprescription, the guidance should center on outcomes and goals to allow for context sensitivity and use of existing knowledge.

- City departments, neighboring jurisdictions such as the Port of Oakland, and infrastructure owners/operators really need to be at the table first. Community members should be empowered to weigh in on feasible alternatives and outcomes that they can genuinely shape, and ideally be compensated for their time. The timing of various engagement activities should be contextually sensitive, to do otherwise is to risk perpetuating engagement fatigue and public frustration.
- The RSAP guidance should recommend, not require, local jurisdictions to work with Community-Based Organizations (CBOs) under a formal agreement. We are working with CBOs and neighborhood associations currently and need to fill in many gaps. The outcome of engagement should be what matters most. This requires dedicated funding; we cannot contract/create a partnership agreement with a CBO or several CBOs and not expect to provide money for their work. Without dedicated funding for CBOs, this will limit local jurisdictions' ability to initiate important and timely assessments. They may not even necessitate an elevated level of community input until later in the process.

3.2.2 Minimum Categories and Assets

- We appreciate BCDC providing asset data for use in this plan but remain concerned that some of the remaining data sets may be difficult to obtain and the number of required assets to be analyzed is very long and will be extremely challenging to conduct detailed analysis of all these assets.
- This list includes data primarily providing the *location* of the assets, supporting the exposure analysis. However, additional asset-based characteristics are often required to inform the sensitivity and adaptive capacity of the assets(s), such as their age or condition. Consider providing additional regional resources to inform sensitivity and adaptive capacity of the required assets.
- 3.2.2 lists items to be mapped but includes items that are more suitable for description. The physical location of a CBO office is not necessarily the physical extent of the communities they are working with. It is unclear whether specific types of CBO should be mapped, such as environmental groups, or any community serving non-profit organization.

3.3.3 Adaptation Strategy Standards

- Recommend using this matrix and these requirements to support strategy development, rather than using it for evaluating strategies. What is being asked for is extremely detailed and exhaustive for a planning level document.
- Recommend converting this into a series of *recommended* questions (not requirements) to ask of the project team during the strategy development process. These are great suggestions for how to approach the development of adaptation strategies and explore the range of options, but they don't make sense as "requirements" (e.g., What exactly is required? Answering all the questions for each reach in the document? Creating 15 alternatives for each reach that maximize the objective of each question?).

COMMENT #230

PDF – CITY OF REDWOOD CITY



October 18, 2024

San Francisco Bay Conservation and Development Commission
Attn: RSAP – City of Redwood City Submission
375 Beale Street, Ste. 510
San Francisco, CA 94105
Via email to: publiccomment@bcdc.ca.gov

Re: RSAP Comment Letter from the City of Redwood City

The City of Redwood City (City) submits the following comments regarding the San Francisco Bay Conservation and Development Commission (BCDC) Bay Plan Climate Change Policy amendment and draft Regional Shoreline Adaptation Plan (BPA 1-24).

The City supports BCDC's effort in establishing a Regional Shoreline Adaptation Plan (RSAP) consisting of a One Bay Vision, a set of strategic Regional Priorities, and Subregional Shoreline Adaptation Plan Guidelines (Guidelines) for local governments.

Generally, the City would like to receive more information as to how much the BCDC guideline considered existing land use patterns and jurisdictional zoning within its plan boundaries. In addition, the City would like to know if there has been any specific consideration of more recently adopted housing elements that may result in increased population with certain locations impacted.

The RSAP notes the need for local governments to periodically update their adopted plan; every 5 years for a limited update and a 10-year cycle for a comprehensive update. This timeline is relatively short. Are agencies anticipated needing to continually re-do all the elements within the plan on a 10-year cycle? Is perpetual funding anticipated to help with needing to refresh those studies on a continual basis? The City would also like to get clarification if there is an expectation that the RSAP will also be updated at a certain point with new standards for Agencies to adopt.

The City has completed its Sea Level Rise Vulnerability and Adaptation Planning Study recently and looking for directions to ensure that it has met the requirement of the Subregional shoreline Adaptation Plan elements A, B, C, and D.

The City would also like to know if BCDC has done any economic analysis as part of the role out of RSAP. Although there is useful information regarding available grants to assist agencies to implement the RSAP, the City hopes that BCDC will further invest in additional staffing for outreach, engagement, and technical support to assist agencies in pursuing available grants to comply with the RSAP. In addition, the City the grants associated with SB 1 appear to be limited and could dry up in short order, are there any expectations that additional funding will be available to agencies.

Additionally, will SB1 funding anticipated be available to help cover costs for jurisdictions for efforts related to the 5-year limited update and the 10 year comprehensive update?

The City has the following feedback and questions regarding RSAP:

1. Is the “Project” for compliance with CEQA identified in section 3.4.2 considered to be the act of putting the Subregional Shoreline Adaptation Plan together, or is BCDC anticipating that the plans will include a full environmental study completed for any/all of the Adaptation Strategies and Pathways?
2. If a local agency is aware of a change that needs to be made to BCDC’s mapping layers (i.e. an asset identified as critical infrastructure has already been moved out of the location shown on the map), what is the best way to coordinate with BCDC to update the map?
3. How do the BCDC Sea Level Rise scenarios compare to those of other agencies, such as FEMA? Due to the size and complexity of many of the construction projects that will be necessary to address sea level rise, it is likely that federal grant funding will be needed to fund construction. If using federal funding, projects will be required to also meet the sea level rise and coastal hazard criteria as defined by those federal agencies. Is there an opportunity to align those scenarios criteria so that projects are able to meet the standards of all agencies that may be reviewing?
4. Where in the plan would agencies identify any areas within their jurisdiction that are already adequately protected against sea level rise?
5. If local agencies currently have a project in the pipeline, what section of the plan is appropriate to include that? For example, if there is a conceptual plan for a project to address sea level rise that is going through the site investigation, design drawings, and environmental evaluation phase, but does not anticipate construction until grant funding is available, would that project be considered within the planned future changes (B2) section of the report, or should it be included in the project implementation plan (F1) section?
6. Section 3.1.1, Plan Requirement A2: The planning area is indicated to include area outside of the jurisdictional boundaries. Is it anticipated that local jurisdictions create a plan for areas outside of their own jurisdiction, or is this only to identify the other jurisdictions that must be coordinated with?
7. Section 3.1.2, Plan Requirement B1, f: Jurisdictional regulations could also be considered a barrier, i.e. if fill is proposed and the RWQCB / USACE / US and/or CA Fish & Wildlife are opposed to any fill.
8. Section 3.1.2, Plan Requirement B2, e: Historical Conditions – Does BCDC have a resource available for this information?
9. Section 3.1.3: The third paragraph (beginning with “Based on existing...”) seems to be restating the same thing twice.

10. Section 3.1.4, Plan Requirement D3: Would local agencies create their own evaluation criteria or would BCDC be anticipating the same evaluation criteria be used for all Adaptation Plans?
11. Section 3.2.1, Table 3-1: To help simplify, recommend removing the 4.9 ft scenario for Element C, etc. if it will not be utilized for Element D.
12. Section 3.2.4, Standard 13: Does BCDC anticipate that RWQCB, US and/or CA Fish & Wildlife, and USACE will allow for fill in the Bay if these arguments can be made? Have those agencies indicated that fill would be acceptable if the public benefit for fill exceeds the public detriment, there is no alternative upland location, and is the minimum amount necessary?

Thank you so much for providing the opportunity to review the RSAP and to be able to submit comments and questions.

Sincerely,

Sindy Mulyono-Danre

Sindy Mulyono-Danre
Public Works Services Department
smdanre@redwoodcity.org

Redwood City Review Team:

- Patti Schrottenboer, PE, QSD/P – Senior Civil Engineer
- Ryan Kuchenig – Senior Planner
- Sindy Mulyono-Danre – Special Projects Manager

COMMENT #231

PDF – League of California Cities



October 18, 2024

Public comments transmitted via:
publiccomment@bcdc.ca.gov

San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105

**RE: Draft Regional Shoreline Adaptation Plan (RSAP): Sea Level Rise Planning
Guidance (SB 272) – Public Comments**

Dear San Francisco Bay Conservation and Development Commissioners and Staff:

On behalf of the League of California Cities (Cal Cities), thank you for the opportunity to provide comments on the Public Draft of the Regional Shoreline Adaptation Plan (Draft RSAP), now including sea level rise planning guidance, as required by SB 272 (Chapter 384, Statutes of 2023). Cal Cities advocates on behalf of California's 483 towns and cities, including the 44 cities, lying in whole or in part, in the San Francisco Bay. Cal Cities prioritizes planning efforts to strengthen climate change resilience and disaster preparedness as a core local government function and recognize the state's role in providing guidance to support coordinated approaches among local governments to achieve statewide climate goals. We are appreciative of the San Francisco Bay Conservation and Development Commission (BCDC) staff for organizing a meeting with Cal Cities and for engaging our members to provide an overview of the Draft RSAP on October 7, 2024. We recognize BCDC's long-standing engagement and your continued commitment to working with local governments.

This letter is submitted as public comment to BCDC by the October 18, 2024 deadline. Specifically, we offer the following comments on the Draft RSAP:

1) The Draft RSAP must adhere to the statutory requirements identified in SB 272, including that local governments within BCDC's jurisdiction must complete their sea level rise plans as part of a Subregional Shoreline Resiliency Plan by January 1, 2034.

As stated in SB 272, statute specifically identifies the requirements local governments must meet by the specified deadline. SB 272 requires a local government in the coastal zone or within the San Francisco Bay to 1) develop a sea level rise plan as part of either a local coastal program or a subregional San Francisco Bay shoreline resiliency plan (subregional plan) that includes certain information, including sea level rise adaptation strategies and recommended projects, 2) requires local governments to comply by January 1, 2034, and 3) prioritizes funding for implementation of sea level rise adaptation strategies in approved plans. In our meeting with BCDC on October 7, 2024,



it was encouraged that each city individually submit their own sea level rise plan or be part of a multi-jurisdictional plan. SB 272 does not require each individual local jurisdiction to develop and submit a sea level rise plan for approval by BCDC. SB 272 requires that a local government in the San Francisco Bay develop a sea level rise plan as part of a subregional plan and submit the subregional plan to BCDC by January 1, 2034. Subregional plans are the planning documents that are subject to approval by BCDC. This is critically important to the successful implementation of SB 272 because cities and other local governments have limited resources, both funding, staff, and resources, to develop their own sea level rise plans. Rather, where cities can partner with their neighboring cities and counties, to leverage resources, data, and information to support this planning effort. Additionally, this is why SB 272 provided 10 years for local governments to coordinate and develop these multi-jurisdictional sea level rise plans as part of the subregional plans. The Draft RSAP must maintain its description of subregional plans and SB 272 requirements, which accurately articulates these requirements (subsections 1.2.2 and 1.3). However, on page 167 of the Draft RSAP, the description of the role of cities must be clarified to include the following language to ensure that the statutory requirements on SB 272 are clearly articulated:

"Cities that lie, in whole or part, within BCDC's jurisdiction ~~are required to may~~ ~~either~~ prepare a ~~sea level rise plan as part of a subregional plan~~ that covers only their jurisdiction or participate in a multijurisdictional plan. In either case, cities ~~must comply with~~ should review the Guidelines to ensure any necessary ~~around~~ coordination with their county as well as other cities ~~is met~~. Required roles for cities include:

- *Developing a ~~sea level rise plan as part of a local plan~~ (Subregional Plan) that covers the jurisdictions of ~~the~~ a city or town lying within the San Francisco Bay.*
- *Adoption of the ~~subregional~~ plan by the local council prior to submittal of the plan."*

2) The Draft RSAP must remove the inaccurate requirements that Subregional Plans must be updated or amended routinely on a 5-year and 10-year schedule.

While SB 272 does require local governments in the San Francisco Bay to develop sea level rise plans as part of a subregional plan, there are no required amendments or updates to the subregional plans that must be met per statute. The Draft RSAP must change the language in 'Section 3.4.3 Updating Plans' to be permissive, rather than require these updates routinely on the 5-year and 10-year. This is not statutorily required and is therefore an overreach of what is required of local governments. Section 3.4.3 in the Draft RSAP must be revised to encourage local governments to perform routine updates or amendments, but not require them. As currently written, by deeming the subregional plans "out of compliance" for failing to submit a 5-year or 10-year update is beyond the requirements of SB 272 and punitive on local governments who need time, funding, and resources to implement the plans they will have just developed.



3) The Draft RSAP should include recognition that for SB 272 to be considered operative, there must be available funding.

In 2022, SB 867 (the legislation prior to SB 272) was vetoed by the Governor based on not having available funding to support the implementation of the requirements in the bill. To address this issue, SB 272 included the specific provision in Public Resources Code Section 30985.6 that states:

"The operation of this division is contingent upon an appropriation for its purposes by the Legislature in the annual Budget Act or another statute."

The Draft RSAP should include a reference in Section 1.3 to this provision of the bill showing the contingency this places on the overall operative nature and implementation efforts of the bill. Funding made available in the annual budget or another statute could support both the state and local governments to meet the intent of SB 272, which is to develop local sea level rise plans. We commend BCDC for including a funding strategy as part of the subregional plans; however, funding must be made available to local governments to meet the planning efforts required under SB 272, as well as future implementation efforts of the subregional plans once developed.

We respectfully submit these comments on behalf of the San Francisco Bay cities and towns. Please contact Melissa Sparks-Kranz, Cal Cities Legislative Representative, at msparkskranz@calcities.org or 916-658-8232 should you have any questions regarding our public comments.

Sincerely,

A handwritten signature in blue ink that reads "Melissa J. Sparks-Kranz".

Melissa Sparks-Kranz
Legislative Representative
League of California Cities

COMMENT #232

PDF – Sustainability, Parks, Recycling And Wildlife Legal Defense Fund



SPRAWLDEF

Sustainability, Parks, Recycling And Wildlife Legal Defense Fund

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510-295-7657 www.sprawldef.com n.laforce@comcast.net

October 18, 2024

Via Email ONLY

publiccomment@bcdc.ca.gov

Commissioners,
Bay Conservation and
Development Commission

Re: RSAP

To the Bay Conservation and Development Commission:

SPRAWLDEF makes the following comments regarding the Preliminary Recommendation for Proposed Bay Plan Amendment No. 1-24 to Adopt a Regional Shoreline Adaptation Plan and Establish Guidelines for the Preparation of Sea Level Rise Plans Pursuant to Senate Bill 272 (Laird, 2023), hereinafter simply referred to as the RSAP.

SPRAWLDEF is a 501c3 non-profit corporation dedicated to protecting our environment and enhancing and restoring habitat and wildlife in the Bay Area. It was a recent petitioner in the CEQA case to stop the proposed large scale development at Point Molate in Richmond and has advocated for the East Bay Regional Park District to purchase Point Molate as a regional park. SPRAWLDEF also supports the allocation of \$36 Million in State funds to assist in that purchase. It is also a plaintiff in the lawsuit to require DTSC to fully clean up the highly toxic Zeneca site on the South Richmond shoreline, especially since that site will suffer both inundation and groundwater contamination due to sea level rise. The organization has participated with Sierra Club's Bay Alive Committee working on providing comments to the RSAP.

SPRAWLDEF fully supports the detailed recommendations and comments that the Sierra Club will be submitting. Those comments will not be repeated here. Instead, in this comment letter, SPRAWLDEF will identify three key issues that it maintains BCDC will need to consider as it goes forward with the RSAP.

Before discussing those issues, SPRAWLDEF expresses its opinion that the RSAP as it has developed is an excellent document in many ways. The issue of how to adapt to sea level rise is a complex one and requires an administrative process with carefully crafted criteria for a successful

response to sea level rise. SPRAWLDEF's comments should be taken in that spirit. The RSAP is in many respects a complex administrative framework, but one that is trying to address a very complex environmental issue. In that regard, on October 16, 2024 CNN carried a report that "Humanity has thrown the global water cycle off balance for the first time in human history, fueling a [growing water disaster](#) that will wreak havoc on economies, food production and lives, according to a landmark new report." See CNN website and article at <https://www.cnn.com/2024/10/16/climate/global-water-cycle-off-balance-food-production>. This fact makes all the more imperative that the Bay Area and BCDC respond to the coming sea level rise in ways that are constructive and will work with nature, not against it. With this thought in mind, SPRAWLDEF makes the following special comments.

First, the RSAP should make it a requirement that all individual RSAP's must identify as the preferred alternative a solution that is Nature Based and which will not only protect human infrastructure but also protect and enhance and restore our natural Bay habitats and wildlife. SPRAWLDEF applauds the fact that the RSAP criteria state that RSAP's must include an analysis of how such plans will respond to and deal with the projected 2 meter or 6.6 foot sea level rise. SPRAWLDEF has no doubt that we will see this level of inundation much sooner than 2100 especially given the latest report on our oceans noted above. This level should be mandated as a requirement of all alternatives.

Second, the RSAP must identify how neighboring agencies and entities will work together to develop a single RSAP or separate RSAPs that meet the RSAP criteria of "interconnectedness." A good example is how the multiple entities will respond and prepare individual RSAPs or one master RSAP for the area encompassing the Bay shoreline North from the Oakland Bay Bridge Toll plaza to the University of California's Richmond Field Station. In this stretch of shoreline, we have a sliver of the city of Oakland, the cities of Emeryville, Berkeley, Albany, and Richmond, and the McLaughlin Eastshore State Park which is managed by the East Bay Regional Park District, the toxic Zeneca site, the University of California, and CalTrans (I-80). BCDC must create criteria for RSAPs or one master RSAP to respond constructively to sea level rise for this entire shoreline area. Yet, as it stands now, the proposed RSAP criteria and Guidelines do not provide guidance on how that can or should be done. Clearly, as implementation of the RSAP document goes forward, BCDC will need to develop a guidance document on how a joint response to sea level rise will be developed.

This is vital because one could conceivably have different RSAPs that do not provide overall protection to the shoreline. For example, there is already talk in Berkeley of a large biotech business park at the stables area of the closed Golden Gate Fields racetrack. To protect that site from sea level rise would require sea walls which due to wave action cause destruction of the McLaughlin Eastshore State Park in Berkeley and the Albany mudflat State Preserve which was set up to protect that key wetland area for the health of the Bay. Criteria are needed to aid jurisdictions like Berkeley, Albany, and the other public entities along this shoreline to work together and not adverse to each other and the San Francisco Bay ecosystem.

Third, the Guidance document should also address the role of the Department of Toxic Substances and Control (DTSC) in developing individual RSAPs. The Bay shoreline is littered with toxic sites. Yet, the Guidance document does not provide a place or role for DTSC in the RSAP process. There is little indication that DTSC will have the staff or willingness to become involved and work as a partner in developing RSAPs that are Nature Based. Its record at Zeneca shows that it is an agency that is ignoring clear evidence of toxic contamination due to groundwater impacts that are the result of sea level rise. The Commission should address this issue as soon as it adopts the existing Guidance document in order to protect the Bay and its residents from exposure to toxic substances.

One approach is for BCDC to retain toxicologists as a component of its work under the overall RSAP. At the hearing yesterday, the staff presentation discussed that BCDC may have to retain additional staff to provide necessary expertise to deal with issues that individual RSAPs will face.

SPRAWLDEF looks forward to continuing to work on the issues related to the RSAP Guidance document and RSAPs overall and again appreciates the effort that BCDC and the staff had made to date to respond constructively to the coming sea level rise. To give the Commission an idea of what will happen, SPRAWLDEF includes a map showing the impact of the 6.6 foot sea level rise on the East Bay shoreline from Berkeley through Albany. It is a grim picture of what will be coming.

Sincerely yours,

Norman La Force

Norman La Force
President

COMMENT #233

PDF – San Francisco Bay Regional Coastal Hazards Adaptation Resiliency Group



October 17, 2024

Ms. Jaclyn Perrin-Martinez
Bay Coastal and Development Conservancy
375 Beale St
San Francisco, CA 94105

Subject: CHARG Comments to September 2024 Draft BCDC Draft Regional Shoreline Adaptation Plan (RSASP) Report

Dear Ms. Perrin-Martinez

On behalf of the San Francisco Bay Regional Coastal Hazards Adaptation Resiliency Group (CHARG), we are pleased to submit these comments to the September 2024 draft RSAP. Please note that the comments below do not necessarily represent the opinions of all individual CHARG member agencies. Due to schedule constraints, we were unable to get specific approval from the governing boards of each respective member agency.

CHARG is comprised of the public flood control agencies that ring San Francisco Bay and are the most directly impacted by sea level rise and climate change. As public agencies responsible for providing flood protection to local communities as well as working to maintain the environmental benefits of the Bay shoreline habitat and public access, CHARG members have the most direct connection to both the public and permitting agencies involved in implementation. As licensed engineers responsible for planning, building, and maintaining flood infrastructure, we understand the realities of engineering design, permitting, construction and costs associated with the adaptation elements of the plans being developed as part of the RSAP process. We believe the flood engineering concerns need to be elevated to inform the RSAP and S-RSAPs to result in effective on-the-ground adaptation that benefits our region.

Fundamental Concerns

Scope of the RSAP and Potential Costs - While the RSAP guidance is very well written and contains meaningful planning requirements, many of the plan requirements are general planning goals across multiple areas and are way too broadly written and could result in a planning effort that is very large (potentially much more than other larger efforts such as affordable housing) and could be very costly to prepare the Plans. Plan development costs could potentially be in the several millions of dollars on the county wide scale. BCDC or the State has not committed to provide funding for this effort beyond limited grants mainly to disadvantaged communities, so this potentially becomes a major unfunded mandate potentially beyond the ability of local government to implement, let alone pay for project implementation. The RSAP guidelines contain a number of well-meaning goals that are easy to write, but difficult to implement and the draft guidance document does not acknowledge or provide guidance in the messy real world of project development and implementation. This would potentially lead to plans that are unable to meet the stated goals of the RSAP.



Lack of Guidance on Known Conflicts and Ranking Criteria - Fundamentally, the RSAP doesn't acknowledge or provide insights or guidance on the major known conflicts within SLR adaptation. Failure to address issues directly head-on doesn't move the process forward - rather it leaves all parties in their wishful silos. The RSAP doesn't need to solve all issues but at least acknowledge that trade-offs on a big scale will be required so all parties starting this difficult planning process have this understanding in mind at the start. Just listing multiple goals as requirements in the planning effort (as done several times in the guidance document) that have conflicts with no acknowledgements or guidance is a missed opportunity. A few examples include the following...

- Conflicts between community desires to be protected in-place (including environmental justice issues) and the ability of engineering to protect and maintain large levees, walls and pump stations over time setting up what is known as a "moral hazard" whereby once people rely on these structures, they have to be maintained in perpetuity.
- Conflicts between environmental trade-offs needed to provide cost-effective flood protection, the most obvious examples are tide gates on the numerous tidal channels that are adjacent to homes and infrastructure that may pose some environmental impacts for water quality and fish passage.
- The issue that significant infrastructure existing around the bay edge is either private or is public but doesn't fall under the RSAP process such as PGE power utilities or train lines etc. are not addressed in the RSAP plans and these often are on the front lines of coastal flooding.
- Conflicts with pressures to place development such as affordable housing into SLR vulnerable areas that will then require protection or removal in the foreseeable future. Areas at risk for SLR flooding should not be further developed to the extent possible.
- Potential conflicts with the CEQA process both with regards to project identification prior to conducting CEQA and the impacts mitigation determination and costs inherent to CEQA. We recommend that BCDC track these potential CEQA issues impacting adaptation through the RSAP process and provide the State feedback on how CEQA could be modified (similar to what was done for the AB 52 housing requirements) to streamline the SLR adaptation process. In addition, BCDC could provide feedback to the various permitting agencies in SF Bay involved in the permitting of SLR adaptation projects. This process would be ideal to bring these issues to light for regulatory solutions.

No guidance on ranking of adaptation projects is provided thus leaving it up to the individual plan preparers. We recommend that some guidance on ranking priorities should be provided and that providing flood protection to the existing urban edge should be prioritized over other goals where there are conflicts, such as with public access or aesthetic visual connection to the Bay and even habitat. The RSAP would be stronger and more useful if it didn't promote a number of potentially conflicting goals without any prioritization guidance. The RSAP off-loads all these efforts to the local government and localities which is appropriate for final decisions as to priorities, but the RSAP can provide guidance to avoid a wide disparity in plans with regards to level of detail and robustness of the planning effort by each County and City.



Use of Known Engineering Standards in Planning Efforts - There are standard engineering tools already available and approved by the engineering community across the Country that are not well mentioned in the RSAP. These include the FEMA coastal flood building requirements and flood wave modeling work that can inform building within coastal flood zones. The RSAP identifies a flood mapping site (development in progress <https://data-bcdc.opendata.arcgis.com/search?tags=Flood%2520Hazards>) and this can be improved to include better maps related to FEMA with engineering oversight.

Another example is the use of low-head dam safety analysis methods and construction requirements. To design for end of century SLR and beyond (i.e. 6 feet increase in tide levels), we are heading to a bay that is dominated by low lying areas ringed by floodwalls, walls, and/or levees with higher water levels on the bay side, essentially a series of low-head dams at the bottom of the watershed and not the top as typically built. There is a wealth of proven engineering design guidance for this type of construction and even more importantly, the impacts of structural failure. Given the importance of triggers in any adaptation pathway approach, it is at least reasonable to use the approved analysis tools related to structure failure and subsequent impacts to property and human life as one of these relocation triggers that is scientifically based.

Use of known engineering guidance documents will also aid in the planning efforts because it will move adaptation plans that are often prepared by planners and not engineers away from plans that miss many important elements and considerations such as maintenance roads required for levees and need their own ROW as well as integrating a large electrical power structure if pumping for both flood control and groundwater is being proposed (and these are very different pumping systems).

Future Water Levels and Implementation Costs - Sea levels have always gone up and down in San Francisco Bay and on the order of hundreds of feet and not 3 to 6 feet as with the levels in the RSAP guidance document. In the past, both habitats and native peoples were able to move in response to rising tide levels but many of these locations are now communities with fixed homes and infrastructure. Priorities have to be set when there are conflicts and when considering triggers and points-in-time where holding the line simply no longer makes sense. Tidal marsh habitats were able, depending on sediment supply, to move upland in response to SLR and reestablish higher. But now there are fixed communities and infrastructure in the way so as noted below, there will be habitat conversion (and not just loss) as tide levels rise from shallower water habitats to deeper water habitats. This can be planned for as well during adaptation to maximize habitat for these deeper water species and not pretend this isn't going to happen. There is no mention of this in the report.

The enormity of SLR adaptation costs are well beyond the \$110B cost estimate mentioned in the report. The proposed HWY 37 causeway is at least \$10B on its own and this is just one of many large scale roadway efforts that will be needed including significant portions of HWY 101 through Marin County, HWY 880 in the East Bay, HWY 237 in the south Bay, and HWY 101 on the Peninsula. Note that we have concerns over the cost guidance prepared by MTC under separate cover and made these comments during this process. Costs for levees are very site specific and are highly dependent on environmental and geotechnical considerations and real estate values, which are of



course higher in developed areas that need more immediate protection. Thus levees have a very wide range of costs and should not be taken from generic guidance tables but rather developed for each site as best as possible.

RSAP Plan Assessment and Adaptation Over Time - We recommend that BCDC establish an adaptation engineering advisory board of professional engineers including CHARG members to provide input, to monitor the plans and their development, and to identify areas of conflict that may be stopping or slowing down the adaptation planning or implementation. This board would be able to provide experience, identify obstacles or conflicts, and recommend solutions to both policy and regulatory changes to overcome obstacles related to SLR adaptation.

CEQA Triggering – we have concerns that identifying projects (Elements F and G) without having gone through CEQA could trigger legal issues. BCDC legal counsel needs to address and respond to this issue and indemnify agencies submitting plans from CEQA lawsuits through the RSAP process if deemed as required.

Specific Comments to the Draft Guidance Document

- Page 5 – Plans must meet minimum standards to “reduce coastal flooding” and specific types are mentioned. We recommend that the flooding types for coastal flooding should also specifically include interior backwater flooding due to gravity stormdrain systems being unable to drain against higher tides. This is a common flooding type due to SLR and is contained in FEMA flood planning.
- Page 11 last bullet on loss of habitat and diversity. This bullet restates a basic misrepresentation of what happens when sea levels rise. SLR adds water into the ecosystem, so it should be more accurately portrayed as habitat conversion and not loss. For sure, certain tidal marsh species may be significantly impacted but there will be other deeper water species (i.e. fish) that will thrive and actually benefit from higher water levels. Bullet should say the “same diversity of wildlife.”
- Page 11 footnote 5 - I think it’s probably Patrick Bernand and not Paul but I didn’t check the reference
- Page 29, Adaptation pathways can be a flawed approach unless it involves consideration of land requirements and reserving rights-of-way for the implementation strategy sooner than later. The realities and difficulties of doing infrastructure projects through a public CEQA process need to be acknowledged and findings brought together to look at needed changes to CEQA similar to those that the State has done for housing need to be developed. In fact, the State housing mandate can be said to directly worsen future SLR adaptation efforts because many of these lower income communities are placing affordable housing directly in future SLR inundation areas, thereby increasing the need and costs to protect these areas in the future. At a minimum, these future housing developments should be designed



to be floodable.

- Page 31, the reference to project lifespan is unclear. Is the project defined as the structure? In that case, a 50-year lifespan is typical but what happens after then? In fact, the project lifespan doesn't exist in reality, as sea levels rise after 2100 the flood protection barrier structure still needs to work or be retreated.
- Page 33, again, no discussion of trade-offs. Of course, levees block direct views, but like the east coast, this is the cost of stopping direct coastal flooding. Requiring plans to address public access, view and recreation is a CEQA level effort that may needlessly drive up the costs for these plans, add years of time to the schedule, or considerably hinder effective adaptation.
- Page 39 – involuntary housing displacement “will need to be balanced with risk mitigation that considers adaptation ...” is difficult to interpret in an actual planning situation. Balance how? Do the RSAPs need to include plans for future housing which is an expensive and entirely different and complex process outside of the RSAP planning scope like the bullet above. Same for Page 49 that the plans “must include policies to minimize displacement risk”. This could be a significant expansion of the planning efforts.
- Page 57 – Document states “the choice is not between adaptation and development” but this is not necessarily true in all situations and at a minimum, the sentence needs to be modified to say “new development” as there is a clear conflict between many existing developed areas. The document needs to be careful not to minimize conflicts with potentially shallow statements. Unlike fluvial flooding, coastal flooding is constant and not a periodic flooding event that can be detained in a flood basin (a common solution to fluvial flooding). Document should contain a better description of the differences between flooding types. Also, coastal flooding contains waves that are very dynamic and difficult to design for in structures, therefore, we recommend the use of FEMA coastal floodplain management framework approved practices for construction in the coastal zone (i.e. building codes and engineering criteria, insurance, hazard mitigation, etc.).
- Page 60 – Infrastructure map is incomplete with regards to critical facilities and should be acknowledged in the report as such. Many facilities such as fiber optics, numerous pipelines, sewer laterals and collection pipes that feed into wastewater plants and force mains etc. are not shown. The RSAP can provide assistance to the subregional adaptation plans by providing these utilities.
- Page 108 – “feasible” alternatives need to be much better defined. Feasible in that it could be built if the property was obtained? Environmental considerations assumed to be mitigated (and funded) elsewhere? And funding is assumed to be available? Almost



anything is “feasible” if funding is not a constraint, rights-of-way can be secured, and CEQA and permitting can be assumed to be approved.

- Page 109 – Intent seems to be for local jurisdictions to develop their own evaluation criteria. While we appreciate the flexibility this could lead to a discrepancy of outcomes.
- D4 page 109-110 – any adaptation strategy needs to consider maintenance in its development. The RSAP guidance should require that adaptation and these strategies be placed on scaled plans and figures and not shown as no width levees for example.
- Page 118 – this entire section on funding is vague and would benefit with additional guidance on what is expected to be submitted. Right now, the plan could be as simple as \$1 local match and assumed \$1B in state and federal grants TBD. Is this an allowable assumption? Also, local government cannot commit to implementing projects without funding secured and approved and certainly cannot assume that future tax-based funding will be secured prior to a vote. So this element will be somewhat subjective unless BCDC provides additional guidance. That may well represent the reality of the situation and as such may be fine so we are just pointing this out.

We appreciate the opportunity to provide comments to this important guidance document. When one looks at this effort from a holistic level, this represents perhaps the largest civil works flood protection project ever built in US history, larger than New Orleans and likely larger than the existing planning efforts in response to Hurricane Sandy. Yet, the BCDC RSAP effort is proceeding as a piece-meal local planning effort with no funding source. Furthermore, it is being proposed to be completed through individually led processes subject to CEQA as opposed to other collective efforts, i.e. the Dutch which has taken a central government design and implementation approach to this flood works effort implemented through the equivalent of eminent domain and not subject to local CEQA constraints.

All approaches have their pros and cons and we are not advocating for a central government control approach, but we believe that this piecemeal approach needs to be more standardized and fundamentally grounded in flood control engineering for the flood control infrastructure elements of the planning effort. CHARG member agencies have this expertise and need to be incorporated into the RSAP planning efforts. Finally, there are limits on the ability of engineering to hold back the forces of water, particularly nature-based solutions. As flood engineers, we know first-hand the difficulties in building large infrastructure projects along the complex shoreline of SF Bay. Cost needs to be inclusive of all maintenance requirements and a permanent funding stream established for any infrastructure project built that has a failure risk that may damage lives or property. Triggers for relocation need to be more prominent in the pathway approach. We understand the political divisiveness of this issue, but it is a reality that there are both technical and financial limits on our ability to hold back the forces of nature.



The RSAP process also provides opportunities for phased cost-effective adaptation that maximizes the use of natural approaches combined with traditional engineering where appropriate.

Specific Opportunities for engineering input into the RSAP process:

- a. Adaptation of RSAP Over Time. The RSAP under review will evolve as experience is gained, and specifically to address challenges such as those identified in this letter as well as new challenges that will emerge. We see several mechanisms identified in the RSAP that can be used to assist development of S-RSAPs and inform the next RSAP update within an adaptive management concept;
 - i. Section 3.1.5 Element E: Land Use and Policy Plan methods to facilitate adaptation will need to be developed to assist S-RSAPs.
 - ii. The Online Mapping Platform in development can assist with regional opportunities and constraints in a georeferenced framework, and Section 4.3 Recommended Coastal Flood Hazards and Assets; 4.3.1 Additional Coastal Flood Hazards identifies additional exposure mapping
- b. Ensure engineering assistance is consistent with BCDC Bay Plan Climate Change Policy 6 and can be provided by County, State and Federal entities and practitioners. Examples include CHARG and County Flood Control Agencies, BCDC's ECRB and Coastal Engineer, CALTRANS, CA's Sea Level Rise Advisory Team / Collaborative, DWR. We recommend that this engineering assistance facilitate the following:
 - a. Adaptation within the context of Coastal Flood Plain Management which is a framework used by Federal, State and Local governments as well as private practices such as real estate and insurance
 - b. Future Conditions Maps of Flood Plain landscape units, based on hydro-geomorphic modeling
 - i. While future conditions coastal exposure maps do exist (eg. CoSMoS – OCOF; ART), their formats vary from traditional hazard maps which can limit their accessibility to the wide array of practitioners (regulators, planners, engineers, real estate agents, lenders, insurers). In contrast, FEMA-like flood maps (e.g. with High Velocity Zones aka V-Zones which are linked to building standards, etc.) that represent future conditions are expected to be more useful ^{1,2,3,4}. Modification of the existing maps to provide an improved 'hybrid' is one approach.

¹ <https://www.oceansciencetrust.org/projects/sea-level-rise-and-floodplain-management/>

² https://www.oceansciencetrust.org/wp-content/uploads/2016/11/CompReprt_NOAASLR_FINAL_10-19.pdf

³ https://www.oceansciencetrust.org/wp-content/uploads/2016/11/QGCoastalAppendix_FINALDRAFT_2016oct14.pdf

⁴ https://www.oceansciencetrust.org/wp-content/uploads/2018/07/Technical-Methods-Manual_FINAL_2016_12_02_clean.pdf



- ii. Habitat areas and changes with sea level rise can be accomplished using standard methods⁵ and special studies such as those already accomplished for Napa Salt Ponds Wetlands Restoration⁶ and South SF Bay Salt Ponds Wetlands Restoration⁷ and other areas such as Ventura County⁸, Southern Monterey Bay⁹ and Elkhorn Slough¹⁰.
- iii. These exposure and habitat maps can provide guidance based on appropriate methods applied consistently to benefit both the RSAP and S-RSAP geographic frames. In particular, the maps can be used to show:
 - “No action” exposure and habitat maps with climate change,
 - Tool to evaluate proposed S-RSAP elements in terms of sub-regional and regional performance,
 - The public and other agencies.
- c. Use of Engineering Code Frameworks including Project Risk Categories and design criteria, including sea level rise amounts. Risk Categories are identified in Federal Codes (e.g. ASCE 7 Table 1.5-1 Risk Category of Buildings and Other Structures for Flood, Wind, Snow, Earthquake, and Ice Loads¹¹). The selection of sea level rise scenarios (amounts) could be linked to the project risk category, for example, where low risk elements (coastal trail) may use a lower amount of sea level rise and less extreme flood event than major infrastructure which may use more extreme criteria. BCDC’s ECRB and DRB have experience with these topics and can assist the RSAP process.
- d. Engineering Resources and Review: Quality control can be enhanced by identifying standardized methodologies and reviews.
- e. Again, the Online Mapping Platform within the Technical Assistance Program, together with engineering participation, is a potential mechanism to address the many of the above opportunities, in particular:
 - i. Future Conditions Maps for adaptation planning and alternative assessments (see above);
 - ii. Regional infrastructure;
 - iii. Regional dynamic land use planning;
 - iv. Scenario graphics for public and agency review

⁵ <https://coast.noaa.gov/digitalcoast/tools/slamm.html>

⁶ <https://scc.ca.gov/napa-salt-marsh-restoration-final-eir-april-14-2004/>

⁷ <https://www.southbayrestoration.org/media/habitat-evolution-mapping-project-hemp-decadal-update-final-results-project-virtual-science>

⁸ https://maps.coastalresilience.org/california/methods/ENBA_Ventura.pdf

⁹ https://maps.coastalresilience.org/california/methods/ENBA_Monterey.pdf

¹⁰ https://ambag.org/sites/default/files/2020-07/App_D-SLAMM_Memo_PDF.pdf

¹¹ Minimum Design Loads and Associated Criteria for Buildings and Other Structures (7-16)

American Society of Civil Engineers 2017 / 800 pp. / 2 vols. American Society of Civil Engineers [<https://sp360.asce.org/PersonifyEbusiness/Merchandise/Product-Details/productId/233133882>]



v. Quality control and assurance.

This letter was primarily prepared by Mr. Leventhal and Bob Battalio, P.E. of CoastalFutures and may not represent the opinions of some of the CHARG member agencies. Given the time constraints for providing comments, we were unable to receive sufficient feedback from some of the CHARG member agencies.

Sincerely

Roger Leventhal

Roger Leventhal, P.E.
Chair of CHARG

COMMENT #234

PDF – SARA TOBIN

Sara L. Tobin, Ph.D., M.S.W.
Richmond CA 94801

Date: October 18, 2024

To: San Francisco Bay Conservation and Development Commission
Email sent to: publiccomment@bcdc.ca.gov
Re: RSAP – Public Comment on the Regional Shoreline Adaptation Plan
Draft for Public Comment (September 2024)

Dear Chair Wasserman, Vice-Chair Eisen, and Members of the Commission,

In this personal letter, I would like to address the controversial issue of land use along the Bay Area shoreline in the era of sea level rise. I believe that it makes sense for any undeveloped shoreline to serve two purposes: to belong to the public for relaxation and recreation, and to serve as a location at which to utilize the Natural and Nature-Based solutions (NNBS) that are needed to maintain Ecosystem Services and to protect the Bay shoreline from sea level rise, shallow ground water rise, storm surge, and mobilization of contaminants (among other hazards related to climate change).

If developers are allowed to monopolize the undeveloped shoreline, here is the most likely scenario:

1. They will build luxury housing that will justify high prices with views of the water (with perhaps a few token units with lower prices), while cities will lack sufficient housing for those whose income levels are average and below.
2. The developers will make a huge profit by selling the units.
3. Rising sea levels are likely to cause the development to have a limited lifespan before becoming uninhabitable.
4. The city will have to spend public funds to bulldoze the development and haul it away.
5. Bay ecosystems in that area will be difficult, if not impossible, to restore.
6. You have just seen conversion of a scarce public resource into private benefit, and then a further conversion into a public liability.

Scarce undeveloped lands along the shoreline should belong to the public.

In this context, the City of Richmond can serve as a good example. First, the City has already written a successful OPC SB1 Planning Grant. Second, in 2023, City Councilmember Gayle McLaughlin initiated a measure to conduct an inventory of contaminated sites along the 32 miles of Richmond shoreline, including a search for previously unidentified toxic sites. Third, the City has endorsed use of the Point Molate site on the Bayshore by the public, instead of as a dense luxury residential development. Fourth, during consideration of options for Point Molate, the sentiment to build in the City Center (close to transit and infrastructure, rather than along the shoreline) seemed to gain traction. I am very proud to live in such a progressive city.

Note that Richmond certainly has not run out of challenges such as the Zeneca site, and there are additional challenges to come.

Given the situations that all Bay Area cities are facing, it seems reasonable that cities may choose to place moratoriums on construction along their shorelines until they initiate updates to their General Plans. Such decisions about land use should involve extensive outreach and multilingual public input because all Bay Area residents need to become involved in making some tough and informed choices that will resonate for generations to come.

Sincerely,

Sara L. Tobin, Ph.D., M.S.W.
Retiree, Stanford Center for Biomedical Ethics

COMMENT #235

PDF – Port of Redwood City

October 17, 2024

Sent via E-mail

San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105

Subject: Regional Shoreline Adaptation Plan (Bay Plan Amendment No. 1-24)

Dear BCDC Members and Staff:

The Port of Redwood City appreciates the Commission's leadership and staff's hard work to amend the Bay Plan in accordance with the requirements of SB 272. The Port is always mindful of our role as a steward of the Bay, and we look forward to participating actively in the regional effort to build our collective climate resilience. According to the data preview in the staff report, the Port of Redwood City and nearby communities face a range of potential flood hazards through 2050.

Please consider the following comments on the draft Regional Shoreline Adaptation Plan:

COLLABORATIVE GOVERNANCE

- **Include ports in collaborative governance.** To achieve the goals related to collaborative governance, flood management, and flooding, **ensure that all public ports on the Bay are formally included in working groups or similar advisory bodies related to the RSAP**, in addition to representatives of the local jurisdictions in which they are located. This would apply, for example, to proposed Policy 6.b. regarding collaboration with MTC and ABAG to create “a San Francisco Bay Area Sea Level Rise Funding and Investment Strategy with the input of regional and state agencies, local jurisdictions, flood management agencies, non-profit and community-based organizations.”
- **Promote consistency in Plan Bay Area.** Any Port Priority Use Areas identified in the Bay Plan should be designated Priority Production Areas in Plan Bay Area. The proposed changes to Findings P embrace coordination with other regional plans that impact the implementation and success of the RSAP. Currently, Plan Bay Area, which is intended to implement the requirements of SB 375, fails to identify the Port of Redwood City as a Priority Production Area, a designation that would help ensure that regional planning by MTC and ABAG recognizes the importance of the Port for goods movement, emergency preparedness, and climate resilience. These critical roles of the Port highlighted in the RSAP should also be reflected in Plan Bay Area. BCDC can encourage this consistency where public input to date has been unsuccessful.
- **Consider the role of the federal government in coordinating with local jurisdictions for emergency planning.** For example, the Port of RWC is a FEMA-designated staging area to serve the entire Peninsula and South Bay in the event of potential emergencies, including those associated with sea level rise. To this end, the Port works closely with the federal government and numerous local and regional public agencies to coordinate planning and on-the-ground exercises. Where relevant, the appropriate federal agencies could be included or consulted when designing and implementing the climate resilience strategy.

LAND USE COMPATIBILITY

Consider how the guidance for Development, Housing, and Land Use affects the goals for Critical Infrastructure and Services. Specifically, **ensure that the development of new housing and other non-industrial uses does not compromise the ability of ports to preserve and protect maritime and rail-dependent economic and emergency assets.** There is ample precedent in the Bay Area for non-industrial uses encroaching upon ports and other industrial areas. The importance of this economic and transportation infrastructure for climate adaptation and emergency preparedness makes it essential to adopt policies that discourage the location of incompatible uses in port industrial areas.

POLICY 7

In the description of specific types of projects that should be encouraged if their benefits for the regional strategy outweigh the risk of flooding, consider including:

- Projects that are primarily intended to reduce the risk of flooding or protect infrastructure from sea level rise (e.g., the Port of Redwood City’s reconstruction of two of its wharves to withstand a major earthquake and projected sea level rise through 2050).
- Projects that use dredged materials to restore habitat around the Bay, multiplying the environmental benefits of essential infrastructure maintenance at seaports.

QUESTIONS

- What incentives are contemplated to promote “robust, coordinated adaptation plans” and “projects that meet regional guidelines” and how can local jurisdictions access them?
- If jurisdictions complete their Subregional Shoreline Adaptation Plan earlier than the 2034 deadline, will they be eligible upon approval for priority state funding for implementation of sea level rise adaptation strategies and recommended projects included in the plan? What is the earliest that jurisdictions might be able to access priority state funding if they prioritize their own work on the subregional plan?

Thank you for your leadership on this important planning effort.

Sincerely,

Kristine Zortman
Executive Director

COMMENT #236

From: Margaret Bruce <mbruce@sfcjpa.org>
Sent: Friday, October 18, 2024 12:47 PM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: RSAP - Public Comment

Hello RSAP Team -

Thank you for the opportunity to comment on the draft RSAP documents. After reviewing the draft documents, I am pleased to say I have no suggestions for improvements, and plenty of complements to the team for compiling a useful resource for regional implementers. Thank you! Nicely done.

I do, however, have an observation. While the RSAP is a great inward-facing tool for practitioners around the region, the region also needs some outward-facing tools. I am not sure who to address this observation to, but it seems to me that the region would be well-served if there were an entity that had the input of regional practitioners, and could serve as a united voice on matters of policy, and funding, at the regional, state, and federal level.

I'm sure state agencies and other governmental bodies have legal limitations preventing them from serving in this role, but there are many CBOs, NGOs and others who might be called into this service.

My two cents.

Margaret Bruce
Executive Director
San Francisco Creek Joint Powers Authority
750 Menlo Ave. Suite 250
Menlo Park, CA 94025
(Direct) 650-643-1451
(Cell) 650-384-7850

COMMENT #237

From: Paul Glassner (bushy.nearby_0y@icloud.com) Sent You a Personal Message <kwautomail@phone2action.com>

Sent: Friday, October 18, 2024 12:50 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: Strengthening the RSAP for a Resilient Bay Area

Dear BCDC Commissioners,

Dear BCDC Commission,

The Regional Shoreline Adaptation Plan (RSAP) will shape the future of our region, my community, for years to come. Our Bay waters, shoreline habitats, and communities depend on getting this right.

Commendable Progress, But More Is Needed
The RSAP makes important strides by integrating equity assessments at every stage of planning and setting some strong Adaptation Strategy Standards (Standards) related to Baylands ecosystems.?

However, there are critical gaps in the Standards, an insufficient emphasis on natural and nature-based solutions (NNBS) across plan elements, and a disconnect between the Standards and the rest of the RSAP. Addressing these issues is vital to avoid confusion, ensure compliance, and realize the RSAP's One Bay Vision.

Key Areas for Improvement
To sustainably and cost-effectively protect the Bay Area, please consider the following:

1. Prioritize ecosystem health and NNBS at every step
NNBS offer a cost-effective, win-win approach to SLR. Baylands ecosystems?essential to our communities, our economy, and global biodiversity?are on the front lines of the crisis, both facing risk and offering opportunity. These natural ecosystems provide vital services like flood control, pollution filtration, and climate regulation that our communities depend upon. Yet, SLR threatens their survival just when their resilience tools are most needed.?

* The RSAP should prioritize Baylands health by making NNBS and habitat ecosystems core considerations for every aspect of SLR plan development. As an example, mapping of opportunities for NNBS, including habitat migration, should be included in the checklists for each Strategic Regional Priority.

2. Clarify requirements and emphasize ecosystem health standards
Inconsistent reference to requirements between and among the Vision Statements, the ?required assets and actions? in Section 2, and the Standards in Section 3 may create confusion and hinder progress. Much like the equity assessment, Ecosystem health Standards should be explicitly required in each RSAP element and checklist, ensuring clarity, compliance, and successful implementation.

3. Strengthen Groundwater and Contamination Standards
SLR poses significant contamination risks from toxic sites and landfills along the shoreline. While the RSAP includes a narrow standard for reducing contamination risks due to flooding in socially vulnerable, environmental justice (EJ) communities, it fails

to address non-emergent groundwater rise and soil disruption related to adaptation projects themselves. The RSAP currently also lacks any contamination Standard for non-EJ communities.??

* Expand Contamination Standards\nBroaden the EJ standard to include contamination risks from non-emergent groundwater rise, not just flooding, and add a contamination Standard for non-EJ communities.

4. Define Metrics for Habitat Goals

The RSAP includes a Standard that requires protection, restoration, and/or enhancement of Baylands habitats to ?meet habitat goals,? but these goals are neither defined or quantified.?

* The RSAP should establish clear, measurable habitat goals and require each local plan to specify how it will contribute to them, and BCDC should monitor and report on progress toward these targets to ensure accountability and success.

This is an unprecedented opportunity to safeguard the long-term health and resilience of the San Francisco Bay and its communities. The RSAP has the potential to protect vulnerable populations and ecosystems, but only if it includes stronger, clearer, and more specific guidelines that prioritize natural and sustainable solutions. Please strengthen the RSAP in these key areas to ensure the One Bay Vision becomes reality and secure a resilient future for all.

Thank you for your consideration.

Sincerely,

Paul Glassner

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Member Care at Sierra Club at member.care@sierraclub.org or (415) 977-5673.

COMMENT #238

PDF – Citizens for East Shore Parks

Citizens for East Shore Parks



PO Box 6087, Albany, CA 94706 | Office: 1604 Solano Avenue, Albany, CA 94707
Office: 510.524.5000 | www.eastshorepark.org | cespmanager@eastshorepark.org

October 18, 2024

San Francisco Bay Conservation and Development Commission

Email sent to: publiccomment@bcdca.gov

Re: RSAP - Public Comment on the Regional Shoreline Adaptation Plan.
Draft for Public Comment (September 2024)

Dear Chair Wasserman, Vice-Chair Eisen, and Members of the Commission,

Citizens for East Shore Parks (CESP) is an environmental non-profit in the East Bay that has worked nearly four decades to protect habitat, wildlife, and open space along the eastern shores of the San Francisco Bay, preserving the shoreline for public parks and habitat protection. Current efforts include protecting the natural ecosystems at Point Molate and pushing for cleanup of the AstraZeneca toxic waste site and other contaminated sites along the south Richmond shoreline.

At this moment in time as our planet struggles with the effects of climate change, BCDC is tasked with setting standards for adapting to climate change along the San Francisco Bay shoreline, with implications for generations to come.

While we are tasked to address adaptation planning, we must also keep in mind that we, as a society, will not be able to afford the millions of adaptations required countrywide if climate change continues unabated. Addressing the root causes of climate change will always be more effective and cheaper than adaptation strategies. That said, this letter will comment on the shoreline adaptation called for in the legislation that launched this project.

BCDC does an excellent job in the Regional Shoreline Adaptation Plan (RSAP) with the situations of Environmental Justice (EJ) communities, especially regarding protection from adverse side effects from the plans of more affluent neighbors. This draft takes many situations into consideration and meets appropriately high standards, with one major exception (see below). But while the EJ communities seem to be seamlessly integrated into the RSAP, the biological health of the Bay and contamination risks are presented unevenly and inconsistently. These three factors come to a head on page 148 (document page), point 11.

It is obvious, reading this draft RSAP, that in-house expertise in the causes and characteristics and issues of EJ communities was available. This is to BCDC's credit and reflects well upon the EJ

Advisors. With few exceptions, these EJ issues seem well understood, and the draft RSAP conveys thoughtful concern for addressing them. However, the biological functioning of the Bay has not received the same level of “baked-in” protection for the Bay’s marine life. Instead, a few highly concerned reviewers have caught omissions and too-narrow perspectives as versions of the draft emerged.

This critical project really needed two additional special committees like the EJ committee: (1) a committee to preserve, enhance, and protect marine life and (2) a committee to deal with the imminent risk of contamination to people and to Bay ecosystems.

On page 148 (document page), point 11, the three issues (EJ communities, the biological health of the Bay, and contamination) come to a head. Because the Bay shoreline has been industrialized for over 100 years, areas of toxic contamination are correspondingly numerous. Since proposals for development projects generally trigger testing for contaminants, there may be many sites yet to be identified.

Most of the known shoreline contaminated sites are “capped,” or are facing plans for capping, which means that contamination is located in an open pit, and a cap is installed over the site to prevent accidental spreading of contamination. To the best of our knowledge, none of these shoreline capped sites is sealed on the bottom and sides. Consequently, capped sites are very vulnerable to sea level rise and ground water rise all around the Bay Area (threatening EJ and non-EJ communities alike), and toxins can be washed out into the Bay or under neighborhoods, harming both people and the complex biological ecosystems that benefit humans daily.

The RSAP does not resolve this major dilemma that affects most EJ communities in the Bay Area: shoreline contamination. Federal and state agency cleanups seem to have been highly variable with regard to effective cleanups. There have been documented cases of inaccurate assessments, probable overuse of caps over massively contaminated shoreline pits, and misrepresentations to local EJ communities. Residents who live near toxic sites believe that illnesses and cancers have affected them.

The RSAP draft admits that BCDC is powerless to change this unfortunate situation on page 148 (item 11), when the document tries to place that heavy burden directly onto EJ communities themselves. The EJ communities are told that they “must identify strategies to advance remediation and reduce risks of toxic materials mobilization and vaporization” of contaminants, due to any and all causes of flooding. If EJ communities were able to gather the scientific and legal expertise and political power to insist on adequate cleanups, these dangers of toxic contamination to our communities and the Bay would not exist today. The RSAP draft seems to walk away from this situation, which has developed over decades and is well known among the communities themselves.

BCDC has been open to the need for expanded legislative powers to comply with proposed RSAP standards, but apparently not equally open to the need for oversight of agencies tasked with protecting the environment.

It is notable that BCDC has been working on sea level rise since release of the updated Bay Plan in 2009, whereas DTSC (for example) did not produce draft sea level rise guidance until 2023 (following passage of SB1 legislative requirements in 2021). We have heard no news about efforts by DTSC to prioritize each of the many capped sites along the Bay shoreline for cleanup, or even to make an effort to find all the contaminated sites. Consequently, a massive load of toxic chemicals waits on Bay shorelines for sea level rise to spread it over the entire region, where it will (1) expose everyone and (2) fill the Bay with contaminants and threaten to turn it into a dead zone.

In addition, contamination is a critical issue for selecting sea level rise adaptations because walls and levees are inappropriate on the Bay side of contaminated sites (note: walls and levees are also inappropriate on the landward side of contaminated sites because of toxic effects on Bay ecosystems).

Based on research by Dr. Kristina Hill and members of her laboratory at University of California, Berkeley, as sea levels rise, sea water moves inland, beneath the walls or levees and also beneath the shallow groundwater (because groundwater is lighter). As a result, groundwater is pushed closer to the surface on the landward side of the walls and levees. As the ground water reaches unlined pits where contamination has been deposited, the ground water mobilizes toxins and spreads contamination over a broader area, such as beneath nearby neighborhoods. Sea walls and levees do not block this process, so contamination continues to spread.

It seems that some sort of regulatory authority is needed in order to compel DTSC and other agencies to prioritize, and then to clean up, unlined pits along the shoreline that are vulnerable to sea level rise (often called “capped sites”). This is a massive task, but the stakes are high for human health and the health of the Bay.

The land use section (3.1.5., on document page 114) has an excellent list of land use changes. Land use policies should emphasize, as goals, the preservation, enhancement, and protection of ecosystems and ecosystem services. Cities could have extra powers to establish housing where transit and infrastructure already exist.

Further, the RSAP could encourage cities to revisit their General Plans and declare moratoriums (starting NOW) on shoreline development until their plans have been submitted and approved by BCDC. It can be challenging to integrate perspectives that were considered as separate issues in the original draft (i.e., contamination and Bay ecosystems). Over the years, BCDC has been more commonly focused on Bayshore developments and public access to the shoreline. However, the times compel BCDC to provide stronger guidance and direction to protect our entire Bay Area.

Sincerely,

Shirley Dean

Shirley Dean, President;

Sara Tobin

Sara L. Tobin, V.P.;

Robert Cheasty

Robert Cheasty, Exec. Director

COMMENT #239

PDF – SAVE THE BAY



October 18, 2024

The Honorable Zack Wasserman, Chair
Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105

RE: Regional Shoreline Adaptation Plan Draft Guidelines

Dear Chairman Wasserman and Commissioners:

As the largest regional organization working to protect and restore San Francisco Bay, we appreciate the opportunity to comment on the Bay Conservation and Development Commission's (BCDC) Regional Shoreline Adaptation Planning Guidelines (the guidelines). We recognize the many significant efforts — including the creation of the Bay Adapt Regional Strategy and the Adapting to Rising Tides program — that BCDC has taken to prepare the Bay Area for rising seas. Save the Bay supports these efforts and advocated strongly for the passage of Senate Bill 272 to empower BCDC with the authority to develop these guidelines and approve plans prepared by local jurisdictions. We commend the guidelines in taking a strong step towards bill implementation and coastal resilience planning in the Bay Area. We urge the Commission to also consider two priority actions that would strengthen the guidelines:

- Add additional language to provide a clearer framework for addressing competing One Bay Vision strategic priorities; and emphasize the need to maximize decision-making that benefits public rights and resources.
- Strengthen the requirements for how cities address contamination risks from sea level and groundwater rise through more directed land use and community engagement policies. These will better minimize risk related to contamination mobilization near toxic sites.

Below, we detail our overall support for the guidelines and the regional shoreline adaptation planning process, and we elaborate on the changes we propose above. Finally, we note the future need for BCDC to pursue new funding, authority, and

additional inter-agency coordination in order to execute the priorities identified by the guidelines.

The Bay Area Needs Strong RSAP Guidelines

The Regional Shoreline Adaptation Planning (RSAP) process is the Bay Area's opportunity to get ahead of sea level rise to the extent we still can. The guidelines will be used by local jurisdictions in completing their shoreline adaptation plans by 2034, and as the current rate of sea level rise dramatically accelerates around 2050, the regional planning process allows cities to take advantage of a narrow planning window in which proactive adaptation strategies can still be pursued.

This planning process is necessary given the severe risk our region faces as a result of sea level rise. The guidelines appropriately detail how sea level rise is a "threat multiplier" that worsens existing flood hazards and can lead to dramatic housing displacement, significant economic disruption, exposure to toxic contamination, and habitat destruction¹. \$110 billion will be needed for the Bay Area to address sea level rise by 2100, but the cost of inaction is more than double this figure².

Save the Bay appreciates the guidelines' current description of compounding regional sea level rise and climate-induced flood risks. We note that there is no shortage of additional estimates of future risk that are documented in the Ocean Protection Council's 2024 Sea Level Rise Guidance which also speaks to the severity of the threat. For instance, the OPC Guidance estimates that today's rare, "100-year" storm could be occurring daily by the end of the century³. This would be akin to the flooding experienced in the atmospheric rivers of January 2023 occurring every single day – on top of elevated sea levels.

Due to the dramatic impacts that flooding can have on our communities, we commend BCDC for its inclusion of "the high sea level rise scenario" in this document, as well as its recommendation to consider this scenario on the 2100 timescale. The high sea level rise scenario is considered possible by the OPC Sea

¹ Bay Conservation and Development District. (2024). Regional Shoreline Adaptation Plan Draft.

² Bay Conservation and Development District. (2023). *Sea Level Rise Funding Report*. Adapting to Rising Tides. https://www.adaptingtorisingtides.org/wp-content/uploads/2023/07/SLR_FundingReport_Book_ADA_071023_PM.pdf

³ Ocean Protection Council. 2024. State of California Sea Level Rise Guidance.

Level Rise Guidance; and given the very high impact that such a scenario would have on our communities, it is essential to plan for this potential reality where possible.

Additionally, we appreciate the guidelines' emphasis on the need for multi-jurisdiction collaboration, which recognizes the fact that hydrology and habitats don't comply neatly with jurisdictional boundaries. We support equitable engagement of communities in resilience planning and appreciate the lens through which equity is considered in this document. We also note support for the guidelines' requirement that local jurisdictions evaluate the vulnerability of Baylands habitats, which will be one of the first resources jeopardized by rising seas, and which provide multiple unique benefits for communities.

Recommendation #1: Offer Guidance to Balance Strategic Regional Priorities

We appreciate that the guidelines clearly articulate One Bay Vision strategic regional priorities. These priorities balance habitat and community health equally with infrastructure, and all priorities are required to be incorporated into subregional plans. Save The Bay has a long history of working on projects like the South Bay Salt Ponds Restoration Project (which is emblematic of the 'Complete and Connected Ecosystems' regional priority), and we deeply understand how necessary regional visioning and multi-jurisdictional collaboration are to such projects.

We note however, that local governments are going to face many situations while embarking on shoreline adaptation planning where regional priorities compete. For instance, the proposed redesign of Highway 37 in the North Bay aims to improve traffic flow and reduce congestion but could also have significant impacts to the San Pablo Bay National Wildlife Refuge, which provides critical flood resilience capacity and supports native wildlife. In this instance, the highway improvements could come at the cost of critical habitat, pitting the regional priority to 'Move People and Goods' against the priority of 'Complete and Connected Ecosystems.'

Decision-making in such instances would benefit from some acknowledgement and guidance around how to balance priorities. One lens through which BCDC can offer meaningful guidance is to recommend that local jurisdictions holistically consider the extent to which a project benefits or negatively impacts public rights and resources.

The State Lands Commission’s document, “Shoreline Adaptation and the Public Trust⁴,” describes how all adaptation strategies have advantages or disadvantages for public access, recreation and enjoyment of the shoreline⁵. Local jurisdictions should consider how any given strategy might impact these rights – particularly when a strategy may have privatized benefits but would otherwise damage the public trust. Local planning should also seek to maximize benefits for the public in their decision making.

The guidelines can address conflict resolution and the need to consider the public trust by adding the below italicized paragraph to “Section 4.4 Element D: Adaptation Strategies and Pathways”:

“In recognizing that the strategic principles of the One Bay Vision may occasionally conflict, decision-makers must carefully navigate these challenges and seek to maximize public trust rights and resources in their outcomes.”

This concept could again be incorporated into Plan Guidelines Element D, under D.3 which concerns how local governments should evaluate alternative adaptation strategies, with the italicized addition:

“D3. Evaluate adaptation alternatives to identify preferred adaptation strategies for shoreline reach(es). C1-a. Evaluation Criteria. Include evaluation criteria that reflects your planning assumptions, local vision and the One Bay Vision, incorporates the Equity Assessment questions for Element D, and reflects known tradeoffs and challenges in your community. *Decision-making around competing strategic regional priorities should seek to maximize holistic benefits to public trust rights and resources.* The evaluation criteria should be applicable to evaluate adaptation strategies and include a scoring system or some means of evaluating strategies against each other.”

These suggestions seek to acknowledge the potential tradeoffs to the public that specific adaptation strategies may have. When these concepts are applied to the example of a potential freeway expansion into marshland, our suggested recommendations can prompt local jurisdictions to more inclusively consider the broad benefits of marshes as a public resource (i.e. for recreation, habitat, and flood protection) than may otherwise take place.

⁴ <https://slcprdwordpressstorage.blob.core.windows.net/wordpressdata/2023/12/Shoreline-Adaptation-Report.pdf>

⁵ California State Lands Commission. 2024. “Shoreline Adaptation and the Public Trust.”

Recommendation #2: Specify how local jurisdictions can minimize risk of toxic contamination

Groundwater rise and the related threat of mobilized contaminants present a paramount environmental justice concern in the Bay Area. We appreciate that the adaptation strategy standards included in the guidelines require cities to consider how to reduce related risks, including by prioritizing where remediation is happening and outlining how cities are coordinating with relevant state and federal regulatory agencies.

We note that this is an area where local governments are limited in how much they can lead in reducing risk on this issue. State and federal agencies with jurisdiction over contaminated sites are only beginning to incorporate groundwater rise consideration into their management perspectives. As of February 2023, the Department of Toxic Substances Control has a policy that requires contaminated site managers to consider the impact of rising groundwater using a sea level rise vulnerability analysis process, but this applies to the sites they are currently working on, not to closed sites⁶. Additionally, the State Water Resources Control Board lacks such a policy.

Given this gap in effective regulatory risk mitigation and the contamination and public health risk that groundwater rise poses to communities; the guidelines should require local jurisdictions to create sea level rise & groundwater overlay zones. Overlay zones are necessary to identify areas where contamination threats exist, and they provide an opportunity consistent with local land use authority to protect development from being sited in harm's way. Overlay zones can also be used to help guide updated building inspection standards within these at-risk areas. Such a policy could be easily included in Section 6.4 'Adaptation Strategy Standards' (beginning on page 81):

Adaptation Standard Addition: Require Sea Level Rise and Groundwater Rise Overlay Zones with development standards that protect against contamination and flooding."

⁶ DTSC. 2024. Sea Level Rise Guidance to DTSC Project Managers for Cleanup Activities.

This policy provides a clear and meaningful way for local governments to take leadership within their existing authority to reduce further risk to their communities presented by toxic contaminant mobilization and should be listed as a requirement in the guidelines. Examples of standards that could be applied within a Groundwater Rise Overlay Zone could pertain to limiting development and redevelopment; as well as to ground floor elevation requirements, foundation inspections, groundwater level monitoring.

Such overlay zones should also be based on combined flood risk mapping. We appreciate that the guidelines mention the various climate impacts that contribute to flood risk. However, these risks have compounded effects when they occur together. BCDC's Bay Adapt hazard mapping tool should incorporate projections of overlapping/simultaneous coastal flood hazards, not simply map the extent to which each hazard may occur individually. This is highly relevant in understanding realistic groundwater risk, because coastal groundwater table levels can be strongly affected by both sea level rise and extreme storms.

Policies are also needed to encourage local governments to document potentially toxic sites. 1,480 contaminated sites are actively undergoing investigation or remediation by state regulators (DTSC or the State Water Board), but more than 3,000 'closed' sites were remediated without the latest climate science in mind⁷. Additionally, the individuals most likely to be aware of informal dumping grounds and other potential sources of unreported contamination are locals who live nearby and are affected by the waste. We recommend including the following policies in the Guidelines to encourage the documentation of undocumented or sites that are now ineffectively closed at the local level:

6.4 Adaptation Strategy Standards (page 81) Add: *"Require cities to conduct local land use assessments to identify contaminated sites not currently being managed by local, state, or federal agencies."*

7.3 Recommended Additional Assets Minimum Categories and Assets; Shoreline Contamination; Contaminated Sites (page 98) *Include: uninvestigated sites that are identified by community members as contaminated"*

⁷ Hill, Kristina & Hirschfeld, Daniella & Lindquist, C. & Cook, F. & Warner, Scott. (2023). Rising Coastal Groundwater as a Result of Sea-Level Rise Will Influence Contaminated Coastal Sites and Underground Infrastructure. Earth's Future. 11. 10.1029/2023EF003825.

Equity Assessment Requirements Element B3-e "Shoreline Contamination Conditions" (Pg. 140): Add *"Describe contaminated sites identified by frontline communities that are not already in federal or state databases."*

Documentation of contaminated sites is a critical step towards risk management. Local jurisdictions should ensure documentation of known sites in frontline communities by implementing the policies above.

Recommendations for the Future Regarding Funding, Legislation and Inter-Agency Collaboration

Upon adoption of the guidelines, meaningful shoreline adaptation and flood protection will require the effective implementation of proposed projects. We appreciate that the guidelines call for the identification of project leads, cost and funding plans, and updated timelines for completion; however, there is currently insufficient accountability for local governments to actually pursue implementation.

One effective way the guidelines could encourage implementation is by matching project proposals with existing regional funding opportunities. Requiring project tracking through existing databases like EcoAtlas could enable BCDC to align proposed projects with existing regional priorities, such as the Bayland Habitat Goals, to ensure that limited regional, state, and federal resources have maximum impact.

Additionally, BCDC should work to help make funding available and access consistent across the Bay Area. Because the projects needed to adapt to sea level rise and climate change are not limited to a single category, a variety of funding sources (transportation, restoration, utility, local capital improvement) will all be necessary. BCDC should acknowledge that new regional funding sources that prioritize areas of greatest vulnerability, highest need, and largest adaptation impact will be needed in the future and explore opportunities to develop them.

We must also recognize that existing BCDC authority may limit the effectiveness of the RSAP process. BCDC does not currently have the authority to deny a project that is in conflict with an approved subregional plan but is otherwise permissible under the McAteer-Petris Act. The commission also lacks direct authority, beyond plan certification, to ensure compliance with the requirements of SB 272. BCDC should

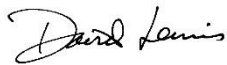
consider whether additional or updated permitting authority, as granted by the State Legislature, is needed to ensure compliance and consistency between approved RSAP plans and development permits.

Finally, we note that these Guidelines will not apply to DTSC or other regulators; they will apply to local jurisdictions. Therefore, we strongly encourage BCDC to consider how to incentivize coordination to ensure that agencies align their internal work with the updated priorities that cities will identify particularly related to the needs to address toxic contamination at risk under sea and groundwater rise scenarios. We recommend, for instance, that BCDC convenes regularly with DTSC and the Water Board to evaluate prioritization and alignment with local jurisdictional efforts to reduce the risk of toxic contamination exposure.

Conclusion

Thank you for your attention to our recommendations on the RSAP Draft Guidelines. This document brings the Bay Area one step closer toward addressing our vulnerabilities to rising seas, stronger storms and moving groundwater; all of which present dramatic flood risk to our communities and habitats. We appreciate BCDC's leadership on shoreline adaptation and encourage you to continue strengthening the document to benefit all Bay Area communities.

Sincerely,



David Lewis
Executive Director

COMMENT #240

PDF – Alameda County Water District



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October 18, 2024

VIA ELECTRONIC MAIL

San Francisco Bay Conservation and Development Commission
Attn: Ms. Jaclyn Perrin-Martinez, Senior Climate Adaptation Planner
jaclyn.perrin-martinez@bcdc.ca.gov & publiccomment@bcdc.ca.gov
375 Beale Street, Suite 510
San Francisco, CA 94105

Dear Ms. Perrin-Martinez:

Subject: Alameda County Water District Comments on the Draft Regional Shoreline Adaptation Plan

Thank you for the opportunity to provide input on the San Francisco Bay Conservation and Development Commission's (BCDC) Draft Regional Shoreline Adaptation Plan (RSAP). The Alameda County Water District (ACWD) was formed in 1914 for the purpose of protecting the water in the Niles Cone Groundwater Basin (Niles Cone Subbasin 2-09.001 or Niles Cone) and conserving the water of the Alameda Creek Watershed. In addition, ACWD provides retail water service to a population of approximately 344,000 primarily within the cities of Fremont, Newark, and Union City. ACWD's geographic service area encompasses approximately 105 square miles, and its groundwater statutory service area includes the three cities as well as the southern portion of the City of Hayward. As our service area lies along the eastern side of the San Francisco Bay, we have great interest in the RSAP and local collaboration on climate adaptation strategies. Below, we have provided background information about our operations and facilities in addition to our comments.

Local runoff, along with water imports, is percolated into the Niles Cone through in-stream percolation and off-stream recharge ponds within the Quarry Lakes Regional Recreation Area and surrounding areas. This water is subsequently recovered through wells and distributed to ACWD's customers as potable supply. ACWD's brackish groundwater desalination facility in the City of Newark produces additional potable supply while simultaneously removing excess salinity from the Niles Cone from historical saltwater intrusion from the San Francisco Bay. Local water supplies (including runoff from the Alameda Creek Watershed and groundwater in the Niles Cone) currently furnish

approximately 40% of the water supply for ACWD's customers and provides over 60% of the supply during dry years.

The Sustainable Groundwater Management Act (SGMA), specifically identifies ACWD as one of 18 agencies that were created by statute to manage groundwater and deemed to be the exclusive local agency to comply with SGMA. ACWD has a number of planning and operational documents and policies under which ACWD carries out groundwater management activities to ensure a reliable and sustainable supply of high-quality water that satisfies present and future water needs for ACWD's customers. These groundwater management activities under pre-existing authority, in addition to the authorities of a Groundwater Sustainability Agency (GSA) under SGMA, have included both groundwater and source water protection and have sought to preserve beneficial uses within the Niles Cone including prevention of saltwater intrusion from the San Francisco Bay.

ACWD's mission also includes a commitment to environmental stewardship through the completion of ACWD's Lower Alameda Creek Fish Passage Improvements Program after more than two decades of coordination, planning, and construction of seven fish passage and water supply projects. These investments and our ongoing partnerships and collaboration in the Alameda Creek watershed represent our continued commitment to balancing the water supply needs of the people of Fremont, Newark and Union City while protecting the environment and wildlife.

In 2023, ACWD completed a climate adaptation plan (CAP) as an initial study to assess ACWD's vulnerabilities and risks associated with potential impacts from climate change.¹ Therefore, ACWD strongly supports a regionwide plan for a resilient and sustainable future for the Bay shoreline, including coordinated, locally planned sea-level rise adaptation actions to realize shared goals.

ACWD has reviewed the Draft RSAP and provides the following comments for your consideration:

- 1) Since ACWD oversees, operates, and manages, water storage and conveyance, which is defined as "critical public infrastructure" in Senate Bill 272, we request that we be included as an interested party in the RSAP and subsequent Subregional Shoreline Adaptation Plans within our service area. ACWD recommends that the final RSAP include figures or tables that identify the agencies that oversee and/or manage critical public infrastructure within the Bay Area to assist agencies developing the Subregional Shoreline Adaptation Plans. In addition, ACWD provides the following comments regarding identification and

¹ Brown and Caldwell and Alameda County Water District. 2023. *Alameda County Water District Climate Adaptation Plan*. Available online: <https://www.acwd.org/DocumentCenter/View/4928/Climate-Adaptation-Plan-CAP-Final-Report-March-2023>.

inclusion of water agencies such as ours in the RSAP and Subregional Plan Elements:

- a. It is unclear why SB 272 did not include Water Treatment Facilities as it includes Wastewater Treatment Facilities. ACWD requests that the RSAP be modified to include Water Treatment Facilities as a separate category to Water Storage and Conveyance.
 - b. Page 83 of the RSAP includes the discussion of Planning Project Team and Affected Parties. ACWD appreciates the inclusion of Special Districts in the Affected Parties list. Since the Bay Area includes a number of agencies who operate, manage, and oversee “critical public infrastructure,” as defined in SB 272, the Planning Project Team should include participation by agencies such as potable water suppliers. In addition, Groundwater Sustainability Agencies that manage groundwater basins within the Bay Area should also be included in this section.
- 2) ACWD recommends that the RSAP include a section regarding SGMA and identify the Groundwater Sustainability Agencies (GSAs) with the Bay Area. Per SGMA, intrusion of seawater into aquifers is considered an undesirable result. Sea level rise may induce seawater intrusion or slow the recovery from past seawater intrusion caused by historical over pumping by not just altering groundwater gradients in aquifers, but also by increasing the inland extent of the tidal reach of flood control channels. During ACWD’s history of overdraft in the early 1900’s, it experienced the vertical migration of saltwater intrusion from shallower aquifers to deeper aquifers through abandoned water wells and in areas where there is no bay mud or aquitard materials preventing the vertical migration.

Accordingly, Subregional Shoreline Adaptation Plans developed in areas where drinking water aquifers are hydraulically connected to the Bay should require flood control projects to consider alternatives that would help prevent additional tidal reaches further inland and subsequent seawater intrusion. Any action taken as a result of the RSAP and subsequent Shoreline Adaptation Plans to prevent such intrusion is critical to the compliance of SGMA.

- 3) The RSAP specifically states that it is not intended to “Change BCDC’s current permitting authority or imply that the projects outlined in subregional shoreline adaptation plans to be submitted can necessarily be found consistent with BCDC’s other current Bay Plan policies.” ACWD sincerely appreciates BCDC’s understanding the need to protect groundwater resources, specifically as outlined in dredging Policy 9.

“Policy 9: To protect underground freshwater reservoirs (aquifers): (a) all proposals for dredging or construction work that could penetrate the mud

"cover" should be reviewed by the San Francisco Bay Regional Water Quality Control Board and the State Department of Water Resources; and (b) dredging or construction work should not be permitted that might reasonably be expected to damage an underground water reservoir. Applicants for permission to dredge should provide additional data on groundwater conditions in the area of construction to the extent necessary and reasonable in relation to the proposed project."

This Policy is protective of groundwater basins and their aquifers that provide drinking water to millions throughout the Bay Area. Projects that remove the mud "cover" may introduce or expedite seawater intrusion into aquifers. Therefore, the RSAP should discuss activities that include sediment removal in creeks, sloughs, flood control channels, as well as directional drilling, piles, piers, etc. along the Bay margin, and recommend that they be carefully considered and evaluated to ensure the protection of aquifers and groundwater supplies. Since the Subregional Shoreline Adaptation Plans must meet Minimum Standards to reduce impacts, ACWD strongly recommends for BCDC's Policy 9 to be incorporated into those plans.

4) Section 1.4.1 The Science of Sea Level Rise and Coastal Flood Hazards.

- a. Figures 1-3 and 1-4 of the RSAP include graphic depictions of potential emergent groundwater under various sea-level rise scenarios. The figures cite "(USGS 2021)" as the source of the groundwater data, but it is unclear whether this reference is a source of existing groundwater elevations (perhaps perturbed by tidal inundation and/or storm surge forecasts) or future groundwater emergence modeling. Please provide a full citation for this reference. If groundwater elevation data were perturbed by future climate forecasts to model future groundwater emergence, as shown on these figures, please describe the assumptions that were used, including (but not limited to) the season corresponding to the groundwater elevation data (i.e., spring or fall), local lithologic information (i.e., presence and distribution of different soil types), and the hydrogeologic properties of the lithologic data.
- b. ACWD's understanding of the USGS CoSMoS groundwater model is that it assumes the subsurface contains homogeneous, permeable sediments; we believe such an assumption may result in overestimation of emergent groundwater conditions. In reality, heterogeneous sediments (including abundant fine-grained materials like silts and clays) are widespread throughout the Bay area, including within the Niles Cone. ACWD recommends utilizing local and regional datasets to support groundwater rise forecasting and development of groundwater rise and emergence maps like Figures 1-3 and 1-4, including (but not limited to) local and regional

boring logs, cross-sections, and similar mapping efforts (e.g., recent efforts by the San Francisco Estuary Institute and others²). ACWD suggests incorporating this information into any sea-level rise risk datasets used for mapping purposes to reflect areas which could be impacted by potential future groundwater inundation.

- c. Page 27 of the RSAP states, “Additionally, hydrostatic pressure will increase [as a result of sea level rise] leading to saltwater intrusion in coastal aquifers.” This may be an oversimplification, as sea-level rise does not inherently lead to saltwater intrusion. It should be noted that modern groundwater management techniques can allow groundwater managers to control groundwater elevations in an aquifer to maintain a sea-ward hydraulic gradient and prevent saltwater intrusion.
- 5) Page 31 of the RSAP states, “[Protect approaches] could also include actions such as groundwater pumping that reduces the exposure of flooding on an area, though that is dependent on continuous upkeep and energy costs.” In addition to consideration of the expected costs associated with groundwater pumping, beneficial use of the groundwater extracted should also be considered. For example, a cost-benefit analysis could reveal a dual benefit of pumping groundwater to both reduce the exposure of flooding and desalinate the groundwater pumped to be utilized for potable supply or other beneficial use.

In addition, ACWD sees promise in the expanded use of reverse osmosis (RO) treatment to combat climate-driven water quality degradation, including saline intrusion stemming from sea-level rise. Based on the Water Board’s “Groundwater General Permit (Order No. R2-2018-0026, NPDES Permit No. CAG912004),” there could be increased beneficial use of the RO concentrate if expanded to include such measures as:

- To supplement instream flows providing an additional beneficial use for ecosystem enhancement.
 - To provide brackish water for salt pond restoration and ecotone levee flora establishment, mitigating coastal erosion, protecting freshwater aquifers from saline intrusion, and creating or enhancing wetland habitat.
- 6) Pages 58 through 61 of the RSAP, Section 2.3.4 Critical Infrastructure and Services, does not show ACWD water storage and water treatment facilities near the shoreline or within the 2100 High – 6.6 ft sea level rise scenario. ACWD would like to collaborate with BCDC to identify any of our critical facilities within the 6.6 ft sea level rise scenario so they can be included on the Figure 2-11 map. Please

² May CL, Mohan A, Plane E, Ramirez-Lopez D, Mak M, Luchinsky L, Hale T, Hill K. 2022. *Shallow Groundwater Response to Sea-Level Rise: Alameda, Marin, San Francisco, and San Mateo Counties*. Prepared by Pathways Climate Institute and San Francisco Estuary Institute.

reach out to Sean O'Reilly (contact info below) for detailed infrastructure information.

- 7) Page 61 of the RSAP, Section 2.3.4 Critical Infrastructure and Services, wastewater treatment facilities are listed as critical facilities and “strategic regional priorities”, or SRP(s). As previously mentioned, water treatment facilities are not identified or sourced. ACWD suggests the RSAP add publicly owned water treatment and storage facilities to the SRP Adaptation Standard – Maintain Reliable Critical and Emergency Services.
- 8) Page 70 and 71 of the RSAP provide and describe a figure illustrating the locations of contaminated sites with “Open/Active” status “exposed to the 0.8 ft (2050) sea level rise scenario but does not include the coastal flood hazard for shallow groundwater rise deeper than 6 ft,” (Figure 2-14).
 - a. It is unclear what information Figure 2-14 aims to present; for example, are the contaminated sites shown on the map only those that are expected to be inundated with overtopped seawater under the 0.8 ft (2050) sea-level rise scenario? ACWD recommends additional narrative text for Figure 2-14 to describe the figure and what it aims to present in further detail for the reader.
 - b. If Figure 2-14 aims to present the risk of mobilization of contaminants due to future sea-level rise scenarios, contaminated sites expected to be impacted by projected shallow groundwater rise should also be shown on the figure. Since Figure 2-14 does not show contaminated sites expected to be impacted by projected shallow groundwater rise, the risk of contaminant mobilization due to sea-level rise is understated in the figure. ACWD recommends the RSAP revise Figure 2-14 to include shallow groundwater rise/emergence.
- 9) Page 90 of the RSAP requires that Subregional Shoreline Adaptation Plans describe the physical conditions and characteristics of the landscape within the planning area, including “topography and bathymetry, vertical elevation and subsidence, erosion, artificial shoreline features, depth of Bay mud, and shallow groundwater depth to surface.” ACWD notes that there are other physical conditions affecting the hydrodynamics of the subsurface other than the depth of Bay mud and shallow groundwater (e.g., thickness and distribution of other water-bearing zones and aquitards, interconnectivity of these zones, etc.). ACWD recommends that Subregional Shoreline Adaptation Plans further characterize physical conditions to include a summary of the hydrogeologic properties underlying the local area, since these properties will affect the degree to which areas may be affected by potential future shallow groundwater rise and emergence.

- 10)The RSAP defines “shallow groundwater” as “Groundwater influenced by corresponding sea level rise amount that is within 9 ft of the surface” (page 130) and “Groundwater that is within 9 ft of the surface” (page 131).
- a. We recommend one of the definitions be revised to be consistent across the RSAP.
 - b. It is unclear why 9 feet below ground surface is used as the threshold to define shallow groundwater. The RSAP should explain the use of 9-feet as the threshold value.
 - c. While we understand that defining shallow groundwater at the regional scale is complex, there is large variation in both subsurface conditions and land use at the local level. For example, there may be areas with unconfined groundwater greater than 9 feet below ground surface that are affected by sea-level rise. We recommend the RSAP to include a provision to allow local governments to define shallow groundwater in their own Subregional Shoreline Adaptation Plans.
- 11)Page 130 of the RSAP states, “Depth to groundwater is mapped within the ‘groundwater rise hazard area,’ defined as the area with projected groundwater change greater than 4 inches due to sea level rise or where groundwater has reached the surface for the given sea level rise scenario.”
- a. The text defines ‘groundwater rise hazard area’ and states that it is “mapped,” but it is unclear where in the RSAP this area(s) is mapped. Page 130 appears to be the only place in the RSAP where ‘groundwater rise hazard area’ is discussed. Please confirm the definition of ‘groundwater rise hazard area’ and clarify how it is relevant to the RSAP. If the text is referring to a mapped feature in the RSAP, please provide a reference to the corresponding figure(s).
 - b. It is unclear why 4 inches of projected groundwater change is used as a threshold to define a groundwater rise hazard area. We recommend the RSAP explain why it is using 4-inches as a threshold value.
 - c. Finally, ACWD appreciates that the BCDC intends to make data to support these guidelines available to support the creation of Subregional Shoreline Adaptation Plans.

October 18, 2024

12)ACWD Contacts: The following ACWD contacts are provided so that BCDC can coordinate and communicate with ACWD as needed on specific topics related to the RSAP:

- Michelle Walden, Groundwater Resources Manager, at (510) 668-4454, or by email at michelle.walden@acwd.com, for coordination regarding ACWD's groundwater resources.
- Sean O'Reilly, Development Services Manager, at (510) 668-4472, or by email at sean.oreilly@acwd.com, for coordination regarding public water systems and infrastructure information.
- Thomas Niesar, Water Supply & Planning Manager, at (510) 668-6549, or by email at thomas.niesar@acwd.com, for coordination regarding ACWD's Climate Adaptation Plan and water supply resources.

Again, ACWD appreciates the opportunity to provide input on the Draft Regional Shoreline Adaptation Plan and looks forward to working with our cities and county within our service area on their future Subregional Shoreline Adaptation Plan(s). Should you have any questions about our comments or need more information, please contact me at (510) 668-4441, or by e-mail at laura.hidas@acwd.com. Thank you for your consideration of our comments.

Sincerely,



Laura J. Hidas
Director of Water Resources

maw/ml

By E-mail

cc: Michelle Myers, ACWD
Thomas Niesar, ACWD
Sean O'Reilly, ACWD
Jackie McCloud, ACWD

COMMENT #241

PDF – Climate SF/City and County of San Francisco



October 18, 2024

San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105

c/o Jackie Perrin-Martinez

jaclyn.perrin-martinez@bcdc.ca.gov

RE: Regional Shoreline Adaptation Plan (RSAP) Draft Guidelines

Dear Ms. Perrin-Martinez,

Thank you for the opportunity to review and provide feedback on the Regional Shoreline Adaptation Plan (RSAP) Public Review Draft Guidelines. On June 6, 2024, we provided detailed comments on Draft #1 and on July 24, 2024, we provided comments on Draft #2. We continue to appreciate the responsiveness to our comments and improvements made to the RSAP Guidelines.

Please consider the following comments and recommendations based on our review of the Regional Shoreline Adaptation Plan (RSAP) Draft for Public Comment. Comments 1-5 highlight improvements to the Guidelines that are in line with our previously submitted comments. Comments 6-11 describe recommendations for additional clarity and flexibility in the Guidelines to better support thoughtful planning of our urban waterfront.

1. We appreciate the clear definitions of “socially vulnerable communities,” “Environmental Justice communities,” and “disadvantaged communities”. We also support BCD C’s alignment with CalEnviroScreen4.0 to prioritize resources in communities that bear sea level rise risk as well as the compounded risks from environmental burdens and social vulnerabilities. In San Francisco, this affects Treasure Island, Fisherman’s Wharf and Bayview Hunters Point.
2. We appreciate BCD C’s reorganization of the “Equitable Participation in Adaptation Planning” section and the introduction of the Equity Assessment Standard, ensuring equity is integrated at each step. In San Francisco, we have conducted rigorous outreach with affected communities. The flexibility provided by the Equity Assessment for Element A allows each jurisdiction to tailor outreach to their specific community while prioritizing vulnerable populations and partnerships with local CBOs. This helps ensure robust participation from disadvantaged, multilingual communities, while streamlining efforts to prevent outreach fatigue.
3. We appreciate the increase in emphasis on ports and urban waterfronts. The Port of San Francisco manages 7.5 miles of waterfront along the Bay, advancing an environmentally and financially stable maritime, recreational, and economic opportunities for San Francisco, the Bay Area, and California. As the RSAP continue to be developed, we encourage BCD C to emphasize and balance maritime and water dependent use needs with other BCD C mission objectives such as access, open space and habitat.
4. Regarding the Sea Level Rise Scenario Requirements, we appreciate the focus on 2050 and 2100 scenarios. We also appreciate setting the minimum requirements for the development of





adaptation strategies to the 0.8 ft (2050 Intermediate) and 3.1 ft (2100 Intermediate) scenarios. Our apprehension regarding the Intermediate-High and High sea level rise scenarios relates to the inherent uncertainty associated with their low confidence assumptions.

5. We appreciate the clarification in Adaptation Strategy Standard 11, which acknowledges that contaminated sites within a City/County jurisdiction may fall under the responsibility of an external party. Local jurisdictions have very limited authority regarding Superfund sites, such as the Hunters Point Naval Shipyard Superfund Site and the Yosemite Creek Superfund Site. We appreciate the ability to meet this requirement through coordination with responsible parties as relevant.
6. **Provide more clarity on the responsibility of City and/or County governments to assess vulnerability and develop adaptation pathways for areas within their jurisdiction that include state and federally managed lands.** Cities and Counties have no jurisdiction in state and federal lands and are thus not equipped to develop strategies and implement adaptation projects in areas they do not control. We would like to see more specific direction on how the minimum standards apply to land managed by state and federal entities within our jurisdiction.
7. **Provide more clarity on the responsibility of City and/or County governments to assess vulnerability and develop adaptation pathways for land and assets outside of local jurisdictional boundaries.** The guidelines remain ambiguous about how to incorporate lands and/or assets that are located outside of a City and/or County's boundary into sub-regional plans. For San Francisco, examples include SFO, SFPUC assets on the peninsula, and Sharp Park (not in BCDC jurisdiction). We recommend that these be included in the (county) sub-regional plans in which they are physically located. This is because of the interconnected nature of these locations with their surrounding environment. This should be stated explicitly in the guidelines to avoid inconsistent plan submissions.
8. **Acknowledge that plans may need to incorporate adaptation strategies and pathways already approved or in the process of being approved by other entities.** We understand and appreciate the need for Adaptation Strategy Standards that can be consistently applied regionally. We also understand that the RSAP provides the flexibility that cities and counties need to develop adaptation strategies that best support local needs and priorities. In our case, the final portfolio of adaptation strategies across our shoreline will include some strategies that have already been approved or are in the process of being approved by local, regional, and federal entities, including BCDC. We request that the guidelines explicitly state that strategies that have already been approved or are in the process of being approved factor into the final selection process of adaptation strategies and that cities and counties not face the risk of needing to revisit already approved strategies. This could be prohibitively costly to local jurisdictions in terms of resources and delays of urgently needed adaptation projects.

San Francisco is in the process of completing the San Francisco Waterfront Coastal Flood Study (Flood Study) with the U.S. Army Corps of Engineers (USACE). The USACE Flood Study includes a recommended adaptive management plan for adapting the 7 ½ miles of the Port of San Francisco's (Port) Bay waterfront to sea level rise which (Draft Plan) was released for public and agency comment in early 2024. The Port anticipates a USACE Chief of Engineer's report to Congress in 2026.



USACE and the Port also convened a Resource Agency Working Group to solicit feedback on the Flood Study and the Draft Plan. BCDC submitted a comment letter on the Draft Plan. As part of the approval process for the USACE Flood Study, BCDC must issue a Coastal Zone Management Act (CZMA) consistency determination.

We respectfully request that BCDC continue to participate in the federal process for the USACE Flood Study and acknowledge the federal plan that emerges from that process without further changes to that plan through the RSAP approval process.

For the benefit of all local agencies, we request amending the RSAP guidelines to specifically reflect BCDC acknowledgement of the USACE planning process as the primary tool for bringing federal resources to the table to address the \$110 billion cost of adapting San Francisco Bay shorelines to sea level rise¹.

9. **Add more nuance to reflect the condition of the urban edge and allow for Bay fill for shoreline protection projects in constrained conditions.** Adaptation Strategy Standard #13 states that “...bay fill must be avoided or minimized for new hardscape or traditional engineering approaches...” This statement doesn’t account for Bay fill that may be required and appropriate for shoreline protection, particularly for urban ports and waterfronts where existing space is limited. In some cases, adaptation of maritime facilities or conflicts between planned coastal flood defenses and existing transportation and infrastructure systems may necessitate Bay fill. This context is acknowledged in many other locations in the RSAP. Please see Exhibit A for suggested edits.
10. **Provide more flexibility for local jurisdictions to reference prior and existing outreach and engagement efforts,** to minimize participation fatigue and to target any additional outreach to fill in gaps. We appreciate the changes to the engagement guidance and minimum requirements. Engagement should be explicitly included in Section 3.5.1 (Using Existing Plans and Plan Content). We recommend encouraging the use of existing/recent outreach and engagement coupled with more flexibility for filling engagement gaps as needed. It is very important to avoid participation fatigue in the communities we serve. We would like to target engagement in specific locations and reference relevant engagement where it has already been completed.
11. **Consider alternate approaches to Element G: Project List from the core expectations of the RSAP Guidelines,** as project-level details change rapidly and become outdated. We maintain that project lists associated with a plan of this scale, detail, and uncertainties require a more nimble and adaptive approach rather than a fixed 5-year list. We recommend a more dynamic database option (in place of Element G) that could be revisited and updated on an annual or biannual basis. Since project specifics change rapidly (e.g., funding, cost, project details), we would prefer to have the most accurate data on hand during plan implementation.

Section 30985.5. of SB 272 (Senator Laird, 2023) states that local governments that receive approval by BCDC shall be prioritized for funding for the implementation of sea level rise adaptation strategies and recommended projects in the local government’s approved sea level rise plan. The Port of San Francisco

¹ Sea Level Rise Adaptation Funding and Investment Framework Final Report, MTC, ABAG, BCDC (2023).



regularly pursues a range of state funding to address a variety of policy and program objectives, including improved air quality, offshore wind and parks and open space. In the future, we would appreciate the opportunity to work with BCDC staff to emphasize that these other funding opportunities are not and should not be implicated by compliance with SB 272.

In conclusion, we commend the thoroughness of the RSAP Guidelines in establishing clear requirements and standards for SB272 compliance and coordinated shoreline adaptation planning across the Bay Area. San Francisco, with its diverse shoreline relationships, takes pride in its proactive sea level rise planning and community engagement. We hope future RSAP iterations allow us to reference existing work, streamline public engagement to avoid overburdening communities, and support thoughtful planning for the unique assets of our urban waterfront.

For any follow up questions, please contact Eric Vaughan, ClimateSF Program Manager at the Office of Resilience and Capital Planning (eric.vaughan@sfgov.org); or Jeremy Shaw, Principal Planner at SF Planning (Jeremy.shaw@sfgov.org); or Adam Varat, Deputy Program Manager at the Port of San Francisco (adam.varat@sfport.com).

Thank you for your consideration of these comments.

Sincerely,

Elaine Forbes
Executive Director, Port of San Francisco
City and County of San Francisco

Rich Hillis
Planning Director
City and County of San Francisco

Brian Strong
Chief Resilience Officer and Director, Office of Resilience and Capital Planning
Chair, ClimateSF
City and County of San Francisco



Exhibit A: Suggested Edits to Bay Fill Policy in the Regional Shoreline Adaptation Plan Guidelines

Appropriately utilize Bay fill for shoreline protection.

In areas along the Bay shoreline where protection approaches for flood risk reduction are utilized, adaptation must appropriately utilize bay fill. This means that bay fill must be avoided or minimized for new hardscape or traditional engineering approaches except as described below, but Bay fill for the purpose of habitat restoration and/or nature-based adaptation may be appropriate. If fill is necessary, include an analysis of why the public benefits of the fill exceed the public detriment, why the fill has no alternative upland location, is the minimum amount necessary for the strategy, would be constructed with sound safety standards, and minimizes impacts to Bay resources. For instance, Bay fill may be required to adapt maritime facilities or to construct seismically stable coastal flood defenses while avoiding near shore transportation or utility infrastructure that would be too costly or disruptive to relocate out of the adaptation zone. Measures should be evaluated to determine whether they will require future Bay fill to remain effective, and measures that avoid or reduce the likely need for future Bay fill should be prioritized. In the adaptation strategies, demonstrate and describe how the strategies avoid and minimize fill for the sole purpose of shoreline protection.

COMMENT #242

PDF - BayCANN



October 18, 2024

Jaclyn Perrin-Martinez, Senior Climate Adaptation Planner
San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105
Submitted via email to: publiccomment@bcdc.ca.gov

RE: BayCAN Comments on the Regional Shoreline Adaptation Plan (RSAP)

Dear Jackie,

On behalf of the Bay Area Climate Adaptation Network (BayCAN), we thank you for the opportunity to provide comments to the Bay Conservation and Development Commission (BCDC) on the Draft Regional Shoreline Adaptation Plan (Draft RSAP). We applaud BCDC staff for developing this new regional plan and program from scratch to align the region under a unified vision for the future of shoreline adaptation. We look forward to working with BCDC, BayCAN members and partners, and local jurisdictions across the region to support the successful implementation of the RSAP.

BayCAN is a collaborative network that includes organizations across the 9-county San Francisco Bay Area – from cities and counties to special districts, nonprofit organizations, community-based organizations, and private sector experts, accompanied by regional and State agency partners that regularly attend BayCAN meetings and participate in BayCAN network activities. The diversity of our membership and partners allows us to bring practitioners together in a collaborative construct to help solve some of our region’s most challenging climate issues.

At the BayCAN Fall Quarterly Meeting on October 2nd, 2024, participating BayCAN members and partners received a presentation from BCDC providing an overview of the proposed RSAP. After this presentation, a feedback session was conducted to solicit input from attendees on the plan. Some members and partners also provided BayCAN with their full comments after the meeting. Although not all BayCAN members and partners share the same perspective on the RSAP guidelines, BayCAN staff developed this comment letter from those aligned comments we observed in member and partner letters, and from feedback sessions. We respectfully offer this summary of perspectives and feedback from across the members and partners of BayCAN to support finalization of this important regional plan.

Address Local Government Needs and Considerations

BayCAN members and partners (BayCAN) feel that compliance with the RSAP will be a heavy lift for local governments across the Bay Area that are already capacity- and resource-constrained. BayCAN recommends the RSAP recognize the limits of local governments’ current capabilities and consider ways in which the final plan and the implementation of the plan can support local government compliance.

- BayCAN recommends explicitly encouraging and enabling local governments to leverage existing work to avoid duplicative work.

- Local governments need to comply with numerous planning mandates that further stretch capacity and can lead to community engagement fatigue. BayCAN recommends aligning with planning timelines for housing, safety, and environmental justice elements, as well as timelines for other required local plans.
- It is important to balance sea level rise with other pressing regional issues like housing and displacement. The RSAP should acknowledge these interconnected challenges and propose adaptive strategies that consider the broader socio-economic context of the Bay Area.
- The preparation and time required for community discussions and outreach are significant and cannot be overestimated, and non-competitive grant funding (beyond the OPC SB 1 funding) will be critical to support local planning and implementation efforts.
- When state agencies like BCDC coordinate with other agencies such as Caltrans and utilities, it enables local governments to develop more effective plans. BCDC can also help promote consistency across regulatory bodies, reducing confusion and overlap. Furthermore, collaboration with agencies like the Department of Toxic Substances Control, State Water Board, and Environmental Protection Agency can streamline the cleanup of contaminated sites, accelerating environmental restoration and making the process more efficient.
- The proposed RSAP requires local governments to submit the Subregional Plan to BCDC both before and after approval. BayCAN recommends BCDC remove review and approval steps, such as requiring submittal twice, to streamline the process. Although some jurisdictions may wish to coordinate with BCDC staff this way, it seems redundant as a regulatory requirement.

Support Cross-jurisdictional Coordination and Collaboration

As a regional plan, the RSAP aims to align the 9-county Bay Area under a unified regional vision, establish a set of shared regional priorities, and provide a standardized set of guidelines to support local jurisdictions in contributing to regional successes. As such, BayCAN offers the following comments to enable the RSAP to better support cross-jurisdictional coordination and collaboration.

- BayCAN recommends providing guidance on how local jurisdictions should handle land that is beyond their control or boundaries, such as adjacent unincorporated areas or federally managed land, that still implicates their ability to comprehensively plan and adapt.
- BayCAN recommends providing guidance on how cross-jurisdictional governance structures could be streamlined, such as by clarifying the roles and responsibilities of cities, counties, and regional agencies throughout the planning process. For example, understanding where the Bay Area Regional Collaborative (BARC) can help with regional governance, identifying leads within and across governance structures, describing how counties can support both individual jurisdictions and county-wide integration, and suggesting partnering strategies for multi-jurisdictional planning projects and for local governments to partner with utilities and the private sector could all help to support RSAP compliance while enhancing regional collaboration.
- BayCAN recommends fostering communities of practice that bring planners and practitioners from across the region together to discuss their planning efforts, share lessons learned, and work towards alignment. BayCAN stands ready to support BCDC and regional partners in activating and engaging our member and partner networks in support of greater regional coordination.
- To work towards regional equity, BayCAN encourages exploring how higher-resourced cities can support lower-resourced communities in advancing regional priorities.
- Recognizing challenges associated with cross-functional engagement, BayCAN recommends providing guidance on how planners can effectively engage public works, flood control, and other agencies, departments, and districts critical to shoreline adaptation planning.

- BayCAN recommends describing benchmarks for measuring progress towards regional priorities and for equitable community engagement, including evaluation frameworks and accountability measures. BayCAN also recommends providing examples of what adherence to the plan looks like in practice.

Prepare Local Jurisdictions for Implementation

The growing threat of sea level rise demands swift action to implement a suite of adaptation measures and projects in a resource-constrained environment. BayCAN offers the following comments to support the RSAP's objective of driving regionally coordinated project implementation.

- BayCAN recommends reconsidering the 5-year sea level rise and science projections update requirement as it may be too stringent and also implicate vulnerability assessments. While BayCAN supports data-driven planning efforts that utilize best available science, the scientific data available and the vulnerabilities may not change significantly over a 5-year timeline. This requirement could take resources away from critical implementation efforts. While reviewing plans to ensure the science is still accurate is important, it should not be so strict as to require an update.
- BayCAN recommends providing guidance on implementation projects, including the best phasing of implementation projects that prioritize the most urgent and time-sensitive projects. A phased approach, starting with actions local governments can implement immediately, then expanding to inter-agency efforts as regional coordination mechanisms mature, can serve as a more achievable pathway. BayCAN also recommends deliberately supporting early pilot projects that can serve as models for other jurisdictions.
- Managed retreat is undoubtedly a challenging topic to explore, especially with communities. BayCAN recommends providing guidance and resources on when and how conversations regarding managed retreat should happen.
- BayCAN recommends local governments have access to non-competitive grant funding to develop and implement shoreline adaptation plans. Additionally, the potential volume and scales of strategies may be difficult to fully consider with limited budgets. BayCAN recommends BCDC pursue all available avenues to secure such funding for the major expenses local governments will incur to comply with RSAP. This may include considering utility partnerships that can bring resources to bear, facilitating innovative partnerships to attract funding for project implementation, and ensuring community-based organization (CBO) set-asides or mini-grants to multiple CBOs to bring diverse constituencies to the table.

Provide Resources to Support Local Planning and Implementation Efforts



To support local jurisdictions in complying with the RSAP, BayCAN recommends providing the following resources:

- A detailed scope of work with sample budgets to help local governments understand and plan for the resources needed to create and implement these crucial plans.
- Resources to streamline Request For Proposal (RFP) processes.
- Templates and best practices for specific project types to avoid duplicating efforts.
- A clearinghouse of private sector partners that could be engaged for specific roles.
- A database of shoreline community centers, training resources, communication best practices, funding opportunities, and community-based organizations for grant applicants to connect with.
- Abbreviated materials to make the RSAP more accessible to community members.

Thank you for your time and consideration of these perspectives from across the BayCAN network. BCDC will also receive letters and emails from BayCAN members and partners directly. We look forward to

supporting the finalization and implementation of the RSAP. Please don't hesitate to reach out to BayCAN's staff, Michael McCormick, at michael@baycanadapt.org and Neena Mohan, at neena@baycanadapt.org, if you have any questions or would like to discuss any of these comments further.

In collaboration,

	
Michael McCormick	Neena Mohan
Director, BayCAN	Program Manager, BayCAN

CC: BayCAN Steering Committee
BayCAN Network

COMMENT #243

PDF – TOWN OF TIBURON

San Francisco Bay Conservation and Development Commission
Metro Center
375 Beale Street, Board Room
San Francisco, CA



Subject: Public Comment on Bay Plan Amendment No. 1-24 to Adopt a Regional Shoreline Adaptation Plan and Establish Guidelines for the Preparation of Sea Level Rise Plans Pursuant to Senate Bill 272 (Laird, 2023)

Dear Bay Conservation and Development Commission,

The Town of Tiburon is submitting public comment for the Bay Plan Amendment No. 1-24 to Adopt a Regional Shoreline Adaptation Plan and Establish Guidelines for the Preparation of Sea Level Rise Plans Pursuant to Senate Bill 272 (Laird, 2023). The Town of Tiburon is committed to tackling the challenges posed by sea level rise, recognizing its potential impact on local infrastructure, residents, and the environment. In a significant step forward, the San Francisco Bay Restoration Authority awarded a \$380,000 grant to the Marin County Department of Public Works for the design of a restoration project at Greenwood Beach, just south of Tiburon's beloved Blackie's Pasture. Instead of relying on conventional concrete rip rap or sea walls, the project aims to restore the beach's natural resilience by replenishing gravel and sand to mitigate flooding and erosion. Additionally, the Town has outlined crucial next steps to enhance community and environmental protection and is prepared to advance these priority measures into implementation.

After reviewing the Draft Regional Shoreline Adaptation Plan, Staff Report and Preliminary Recommendation, we hope that BCDC will consider the following points from the perspective of a local government that has already completed thorough planning to address sea level rise.

- We request that all previous work for sea level rise, including but not limited to vulnerability assessments, climate adaptation plans, hazard mitigation plans, etc., be recognized towards the requirements. The current draft guidelines state that previous work may be used, but does not provide clear guidance on how existing plans will be evaluated and place the burden on jurisdictions to ensure compliance. Direct guidance and technical assistance by BCDC to individual jurisdictions regarding which elements of the guidelines are not met by existing plans would help alleviate this burden.
- We request that BCDC create a draft, all-inclusive Scope of Work with a rough cost associated for local jurisdictions to use to understand the true amount of staff time and funding needed. Since many local governments already have adopted plans or have plans underway, a Scope of Work could be used to amend current plans to fulfill guideline requirements.
- The draft guidelines state that local governments must work with regional transit and utility agencies, however, we have concerns about agency capacity to coordinate with all jurisdictions under the 2034 deadline.



- We have concerns about funding for all jurisdictions to make these plans. The Town anticipates spending a significant amount of local funds in addition to potential grant funds on climate adaptation planning, plus significant staff time. We would need additional funding to meet the requirements outlined in the draft guidelines.
- We have concerns about staff time required to fulfill these new planning requirements, while also moving forward urgent implementation projects to protect our community that have already been identified through previous planning efforts.

If you have any questions or would like to discuss points outlined in this letter, please contact the Town's Climate Action (Sustainability) Coordinator Grace Ledwith at gledwith@townoftiburon.org.

Sincerely,

Greg Chanis

Greg Chanis
Town Manager

COMMENT #244

PDF - Bay Area Clean Water Agencies)



October 18, 2024

San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105
Submitted via email to: publiccomment@bcdc.ca.gov

Subject: BACWA Comments on the San Francisco Bay Conservation and Development Commission's Draft Regional Shoreline Adaptation Plan

Dear Jackie Perrin-Martinez:

On behalf of the Bay Area Clean Water Agencies (BACWA), we thank you for the opportunity to provide comments on the Bay Conservation and Development Commission's (BCDC's) Draft Regional Shoreline Adaptation Plan (Draft RSAP)¹. BACWA is a joint powers agency whose members own and operate publicly-owned treatment works (POTWs) and sanitary sewer systems that collectively provide sanitary services to seven million people in the San Francisco Bay Area (Bay Area). BACWA supports the Bay Adapt platform² and supports BCDC's efforts to ensure that governments and communities across the Bay Area are working together to adapt to rising sea levels.

BACWA appreciates that the Advisory Group established to assist with development of the Draft RSAP included participants from the wastewater sector. Thanks to the diligence of BCDC staff in incorporating feedback from the Advisory Group and other stakeholders, many elements of the Draft RSAP are a substantial improvement compared to early drafts.

BACWA also appreciates that the Draft RSAP specifically identifies POTWs and other wastewater facilities as critical infrastructure. BACWA agrees that adaptation planning for these facilities is a strategic regional priority. The document's callout of POTWs and wastewater lift stations as critical infrastructure in Section 2.3.4 (Critical Infrastructure and Services) and Section 3.2.2 (Minimum Categories and Assets Standard) will help ensure that wastewater agencies fully participate in the preparation of Subregional Shoreline Adaptation Plans over the next decade.

The additional comments below are submitted in the spirit of correcting factual errors, simplifying and streamlining requirements, and reducing the administrative burden of crafting and submitting Subregional Shoreline Adaptation Plans per the guidelines. Given the complexity of the Regional Shoreline Adaptation Plan Guidelines in Section 3 of the Draft RSAP, BACWA strongly recommends working with City or County staff that would be responsible for submitting Subregional Plans to work out technical details and improve document clarity. This engagement needs to occur quickly -- before the Draft RSAP

¹ BCDC *Regional Shoreline Adaptation Plan: One Bay Vision, Strategic Regional Priorities, and Subregional Shoreline Adaptation Plan Guidelines*. Draft for Public Comment, September 2024. Available online at https://www.bayadapt.org/wp-content/uploads/2024/09/BCDC_Draft_Regional_Shoreline_Adaptation_Plan_Appendix-A.pdf

² "Support for Bay Adapt: Regional Strategy for a Rising Bay." Letter from BACWA to BCDC, January 7, 2022. Available online at <https://bacwa.org/wp-content/uploads/2022/01/15-BACWA-endorsement-Bay-Adapt-010722.pdf>

is finalized in late 2024. After the RSAP is adopted, BACWA recommends that BCDC staff prepare a template Subregional Plan for use by jurisdictions.

Comments on Section 3.2.1 – Coastal Flood Hazards and Sea Level Rise Scenarios Standard

The minimum requirements for sea level rise planning in this section, as described in Table 3-1 and the text on page 130, are a fundamental part of the Draft RSAP. They are also likely to change in the future as sea level rise projections change. To highlight the importance of these new standards, some version of the information below should be added to the Executive Summary:

[Page 130]

“For developing adaptation strategies, the RSAP requires adaptation strategies to be developed at a conceptual level and respond to vulnerabilities identified by, at a minimum, the 0.8 ft (2050 Intermediate) and 3.1 ft (2100 Intermediate) scenarios. An narrative description of how adaptation strategies identified in the 3.1 ft (2100 Intermediate) scenario may need to further adapt for flood risk reduction in the 6.6 ft (2100 High) scenario is also required.”

Comments on Section 3.4.2 – Submitting Plans and Getting Approval

BACWA recommends streamlining the administrative process for coordination with BCDC that is described in Section 3.4.2 (Submitting Plans and Getting Approval), as follows:

- **Remove requirements for consultation meetings.** Meetings can be productive, but a regulatory requirement to hold (non-public) meetings is overly burdensome. We suggest edits below that would still *allow* BCDC to schedule consultation meetings without making it a formal requirement.
- **Delegate the Executive Director’s authority.** The Draft RSAP sometimes uses the phrase “Executive Director, or designated Commission staff.” Other times, the phrase “designated Commission staff” is omitted. The Executive Director always has the authority to designate a representative, so this inconsistency is confusing and should be resolved.
- **Remove approval steps to streamline the process.** The Draft RSAP requires local governments to submit the Subregional Plan to BCDC both before and after approval. Although some jurisdictions may wish to coordinate with BCDC staff this way, it seems redundant as a regulatory requirement.
- **Shorten the Commission’s review time.** 90 days – not 150 days – should be sufficient time for the Commission to review a Subregional Plan that has already been deemed complete. For comparison, the McAteer-Petris Act requires the Commission to take action on permit applications within 90 days.

Suggested edits to remove requirements for meetings, delete references to “designated Commission staff,” and streamline the review process are shown below.

[Section 3.4.2, Page 169 – 170]

Initiation of the Subregional Shoreline Adaptation Planning Process

Prior to initiating the process to prepare a Subregional Plan pursuant to Section 30985(a)(2) of the Public Resources Code, a local government must submit electronically to the Commission a notice of intent to prepare a Subregional Plan. ... Within 30 days of receiving the notice of intent to prepare a Subregional Plan, the Executive Director will confirm receipt of the notice and contact the local

government to ~~schedule a preliminary consultation meeting with representatives of the local government to~~ advise the local government on whether information contained in the notice aligns with these Guidelines.

Within 30 days of ~~receiving the notice of intent, the preliminary consultation meeting with the Executive Director, or designated Commission staff,~~ the Commission must electronically post a notice on the agency's website notifying the public that the local government intends to initiate a process to prepare a Subregional Plan. Within 30 days of ~~filing the notice of intent, the preliminary consultation meeting with the Executive Director, or designated Commission staff,~~ the local government must post a notice notifying the public that the local government intends to initiate a process to prepare a Subregional Plan consistent with its local public noticing procedures.

Prior to submitting a request for review and approval of a Subregional Plan, the local government ~~is encouraged to conduct must attend a preliminary~~ consultation ~~meetings~~ with the Executive Director, as described above ~~and must attend at minimum two (2) additional consultation meetings with the Executive Director, or designated Commission staff, during the process to prepare the Subregional Plan~~ to ensure the process and plan aligns with these Guidelines. The consultation meetings ~~must may~~ be included in the workplan and schedule submitted with the intent to prepare a plan as described above. ~~Additional consultation meetings may be conducted based on agreement between the local government and Executive Director.~~

Local Government Approval of Subregional Shoreline Adaptation Plans

The local government must only submit a Subregional Plan for review and approval by the Commission after it has formally adopted the Subregional Plan upon resolution adopted after at minimum one (1) public meeting, of which a 30-day public notice has been given.

~~The local government must provide the Commission with notification in writing of the nature and text of the proposed Subregional Plan at least 30 days prior to adoption.~~

Submittal And Commission Consideration of a Subregional Shoreline Adaptation Plan

The Subregional Plan prepared pursuant to Section 30985(a)(2) of the Public Resources Code must be submitted to the Commission for review and approval. ... The Commission will, after public hearing, either approve or deny the Subregional Plan pursuant to the following procedure:

- a. After a request to review and approve a local government-approved Subregional Shoreline Adaptation Plan has been submitted to the Commission, the Executive Director will review the submittal within 90 days to determine if it is complete. ... If the Executive Director determines that the submittal is complete, and the Plan may be brought before the Commission for review, the Executive Director will electronically post a notice of public hearing setting the date for the public hearing no earlier than **90** ~~+50~~ days from the date that the request to review and approve the Subregional Plan was submitted by the local government. ...

In addition, Section 3.4.2 should specify whether multi-jurisdictional plans require one notice of intent, or whether each jurisdiction needs to file a notice of intent separately.

Comments on Section 3.4.3 – Updating Plans

BACWA's experience is that regulatory uncertainty is a barrier to project implementation. Based on this experience, BACWA suggests deferring the development of specific requirements regarding 5-year Limited Updates and 10-year Comprehensive Updates to a future version of the RSAP. At a minimum, no updates should be required for at least five years after the SB 272 compliance date of January 1, 2034.

The Draft RSAP states that "BCDC strongly encourages submissions before the legislative deadline." (p. 168). However, the proposal to require 5-year updates is a disincentive to early submittal, because early submittal will result in increased administrative costs; the next round of updates will have to begin almost immediately following approval. Furthermore, the administrative requirement to complete 5-year updates threatens the entire purpose of this planning exercise, which is to implement sea level rise adaptation projects. Instead of focusing on implementation, the Draft RSAP requires jurisdictions to continuously work on planning. It creates a tripwire every five years that will make agencies instantly ineligible for funding or permitting of real projects.

Fortunately, there is another way – and it was envisioned by the enabling legislation, SB 272, which mandates BCDC's "**close coordination** with the California Coastal Commission, the Ocean Protection Council, and the California Sea Level Rise State and Regional Support Collaborative" (emphasis added). Based on the language in the Draft RSAP, this "close coordination" does not appear to have occurred. The California Coastal Commission has also released draft guidance for implementing SB 272³ through local coastal programs and permitting, and their language requiring updates is not nearly as prescriptive as that proposed by BCDC. The Coastal Commission's guidance acknowledges that it would be logical for the timing of updates to vary among jurisdictions, noting:

"Timelines for updates should reflect a variety of factors, including how far along a jurisdiction is in their planning process, identified vulnerabilities, and any specific adaptation approaches"
(California Coastal Commission, July 2024, p. 134).

BACWA recommends removing all of the text in the sections on page 172 titled "5-year Limited Updates" and "10-year Comprehensive Updates," to be replaced with a more flexible suggestion to update Subregional Plans as needed, similar to the approach used by the Coastal Commission's guidance. If there is a dramatic change in Sea Level Rise forecasts by 2034, then at that time, BCDC should reissue a new RSAP guidance document and require updates on a new schedule to be determined at a later date.

BACWA also requests the edit shown below to ensure that jurisdictions do not have to change their approach midway through preparation of a plan. Since the Draft RSAP contains requirements related to both product and process (e.g., Element A4.b, "Summary of equitable outreach and engagement efforts, and responses in the Equity Assessment."), it is not feasible for jurisdictions to quickly adapt to new RSAP guidelines.

[Section 3.4.3, Page 173]

Subregional Shoreline Adaptation Plan Guidelines

BCDC will provide updates to the Guidelines contained within this document on a regular update schedule. Guideline updates will reflect new or revised sea level rise science and other information

³ *California Coastal Commission Sea Level Rise Policy Guidance: Interpretive Guidelines for Addressing Sea Level Rise in Local Coastal Programs and Coastal Development Permit*. California Coastal Commission, Draft 2024 Update. Available online at https://documents.coastal.ca.gov/assets/slr/CCCSLRPolicyGuidance_2024Update_PublicReviewDraft.pdf

as necessary. Local governments will be expected to comply with the most current Guidelines version in effect at the time [the jurisdiction filed a notice of intent to prepare a plan of the plan submission](#).

Comments on Section 3.5.1 - Using Existing Plans and Plan Content

BACWA recommends that BCDC be considerably more flexible regarding the use of existing plans (e.g., those completed before the RSAP’s adoption later in 2024). The Draft RSAP contains prescriptive requirements for administrative procedures and report format. As a result, it is virtually certain that any jurisdiction with an existing plan will have to exert significant effort to follow a new BCDC-approved process to produce a BCDC-approvable document. This strict approach will negatively impact the region’s climate resilience by delaying project implementation on administrative grounds. Rather than imposing the strict requirements laid out in Section 3.5.1 and elsewhere in the document, BACWA requests that BCDC offer resources and flexibility to jurisdictions that would like to begin implementation of sea level rise adaptation projects based on existing adaptation plans. Below are suggested edits to encourage faster approval and implementation of existing plans:

[Page 175]

3.5.1 Using Existing Plans and Plan Content

Many jurisdictions already have created much of the content required to be submitted for compliance with these plan Guidelines either through existing adaptation plans, local hazard mitigation plans, general plan elements, climate action plans, or other local plans, such as vulnerability assessments or identified adaptation strategies, projects, or pathways. BCDC encourages the use of existing material when feasible. If jurisdictions submit existing plans, studies, and data to meet the requirements of the RSAP, they must ~~ensure work with BCDC staff~~ prior to submittal ~~that all material that is submitted to determine whether the material~~ is compliant with Guidelines. [For jurisdictions with plans completed before the RSAP was adopted in December 2024, the BCDC Executive Director may offer compliance flexibility regarding the Guidelines.](#)

General Comments and Data Preview Comments

The table below lists requested changes to address minor factual errors in the Draft RSAP. The comments on Figure 2-11 also apply to the data preview.

Page Number and Item	Requested Change	Explanation
Page ii, RSAP Advisory Group	Change “Suisun-Fairfield Sewer District” to “Fairfield-Suisun Sewer District”	The agency’s name is incorrect in the Draft RSAP.
Page 60, Figure 2-11	Correct Figure 2-11 to add about a dozen missing POTWs and remove extraneous facilities that are not POTWs. These changes will also apply to the online GIS layers of critical infrastructure.	BACWA provided updated information on POTW locations directly to BCDC staff via email on September 24, 2024. This information is meant to be used to update Figure 2-11 and used in the online GIS layer for critical infrastructure that will be finalized in 2025.

Page Number and Item	Requested Change	Explanation
Page 61, Sources for Figure 2-11	Remove the erroneous reference to “CalEPA 2023.” Replace the reference with this map hosted by BACWA on the Baywise website: https://baywise.org/map/	According to BCDC staff, POTW data were pulled from a database maintained by USEPA, not CalEPA. Since the USEPA database used by BCDC to generate Figure 2-11 omits some major POTWs in the Bay Area, particularly in cases where several POTWs share a single outfall and single NDPEs permit, additional references may also be helpful. BACWA hosts a map of Bay Area POTWs on the website https://baywise.org/map/ , which may also be listed as a reference in the document.
Page 111	Correct the note that “A template for the matrix can be found in Matrix of Adaptation Standards (Section 3.6.3).”	There is no Section 3.6.3, nor is there a section called “Matrix of Adaptation Standards” Possibly this was meant to refer to Section 3.2.4 (Adaptation Strategy Standards) or Section 3.3.3 (Adaptation Strategy Standards Matrix Checklist).
Page 131, Footnote 1	Replace Footnote 1 with: <i>California Sea Level Rise Guidance: 2024 Science and Policy Update (2024)</i> . California Sea Level Rise Science Task Force, California Ocean Protection Council, California Ocean Science Trust. https://opc.ca.gov/wp-content/uploads/2024/05/California-Sea-Level-Rise-Guidance-2024-508.pdf	The draft RSAP contains an erroneous reference to a January 2024 draft version of the updated California Sea Level Rise Guidance. The suggested replacement is taken from the “Suggested Citation” on page 3 of the finalized document available on the Ocean Protection Council’s website at https://opc.ca.gov/california-sea-level-rise-guidance/
Entire document	Improve the document’s accessibility by using searchable text in table names. For example, “Table 3—5” would become “Table 3-5”.	The table names in the Draft RSAP are difficult to navigate via search tools because they use a special character (em-dash).

Thank you for your consideration of these requests.

Respectfully Submitted,



Lorien Fono, Ph.D., P.E.
Executive Director
Bay Area Clean Water Agencies

cc: BACWA Executive Board

COMMENT #245

PDF - Seaport Industrial Association



675 Seaport Boulevard, Redwood City, CA 94063

October 17, 2024

Sent via E-mail

San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105

Subject: Regional Shoreline Adaptation Plan (Bay Plan Amendment No. 1-24)

Dear BCDC Members and Staff:

Seaport Industrial Association (SIA) offers the following comments on the adoption of a Regional Shoreline Adaptation Plan (RSAP) which would amend the Bay Plan. SIA is a membership organization that represents industrial businesses in the Redwood City port area. Our organization promotes the value of maritime and rail-dependent industrial uses, and we work with local leaders and regional agencies to protect port priority uses.

SIA fully supports BCDC's efforts to advance coordinated regional action through the RSAP to improve the Bay Area's resilience to climate change impacts. Our comments reflect those submitted by the Port of Redwood City:

COLLABORATIVE GOVERNANCE

- **Include ports in collaborative governance.** To achieve the goals related to collaborative governance, flood management, and flooding, **ensure that all public ports on the Bay are formally included in working groups or similar advisory bodies related to the RSAP**, in addition to representatives of the local jurisdictions in which they are located. This would apply, for example, to proposed Policy 6.b. regarding collaboration with MTC and ABAG to create "a San Francisco Bay Area Sea Level Rise Funding and Investment Strategy with the input of regional and state agencies, local jurisdictions, flood management agencies, non-profit and community-based organizations."
- **Promote consistency in Plan Bay Area.** Any Port Priority Use Areas identified in the Bay Plan should be designated Priority Production Areas in Plan Bay Area. The proposed changes to Findings P embrace coordination with other regional plans that impact the implementation and success of the RSAP. Currently, Plan Bay Area, which is intended to implement the requirements of SB 375, fails to identify the Port of Redwood City as a Priority Production Area, a designation that would help ensure that regional planning by MTC and ABAG recognizes the importance of the Port for goods movement, emergency preparedness, and climate resilience. These critical roles of the Port highlighted in the RSAP should also be reflected in Plan Bay Area. BCDC can encourage this consistency where public input to date has been unsuccessful.
- **Consider the role of the federal government in coordinating with local jurisdictions for emergency planning.** For example, the Port of RWC is a FEMA-designated staging area to serve the entire Peninsula

and South Bay in the event of potential emergencies, including those associated with sea level rise. To this end, the Port works closely with the federal government and numerous local and regional public agencies to coordinate planning and on-the-ground exercises. Where relevant, the appropriate federal agencies could be included or consulted when designing and implementing the climate resilience strategy.

LAND USE COMPATIBILITY

Consider how the guidance for Development, Housing, and Land Use affects the goals for Critical Infrastructure and Services. Specifically, **ensure that the development of new housing and other non-industrial uses does not compromise the ability of ports to preserve and protect maritime and rail-dependent economic and emergency assets.** There is ample precedent in the Bay Area for non-industrial uses encroaching upon ports and other industrial areas. The importance of this economic and transportation infrastructure for climate adaptation and emergency preparedness makes it essential to adopt policies that discourage the location of incompatible uses in port industrial areas.

POLICY 7

In the description of specific types of projects that should be encouraged if their benefits for the regional strategy outweigh the risk of flooding, consider including:

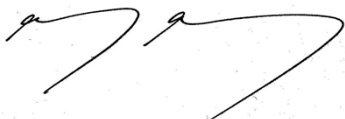
- Projects that are primarily intended to reduce the risk of flooding or protect infrastructure from sea level rise (e.g., the Port of Redwood City’s reconstruction of two of its wharves to withstand a major earthquake and projected sea level rise through 2050).
- Projects that use dredged materials to restore habitat around the Bay, multiplying the environmental benefits of essential infrastructure maintenance at seaports.

QUESTIONS

- What incentives are contemplated to promote “robust, coordinated adaptation plans” and “projects that meet regional guidelines” and how can local jurisdictions access them?
- If jurisdictions complete their Subregional Shoreline Adaptation Plan earlier than the 2034 deadline, will they be eligible upon approval for priority state funding for implementation of sea level rise adaptation strategies and recommended projects included in the plan? What is the earliest that jurisdictions might be able to access priority state funding if they prioritize their own work on the subregional plan?

Thank you for your consideration, and for your forward-thinking leadership.

Sincerely,



Greg Greenway
Executive Director

COMMENT #246

PDF – Marin Audobon Society



Marin Audubon Society

P.O. Box 599 | MILL VALLEY, CA 94942-0599 | MARINAUDUBON.ORG

October 18, 2024

BAY CONSERVATION AND DEVELOPMENT COMMISSION
publiccomment@bcdc.ca.gov

RE: Comments on RSAP

Dear BCDC:

Thank you for the opportunity to comment on the Regional Shoreline Adaptation Plan (RSAP). Planning for the Bay Area to adapt to sea level rise (SLR) is essential and the RSAP is an impressive step toward that goal. But the challenging process of preparing the Subregional Adaptation Plans risks inconsistencies, conflicts and inequities.

We are pleased to see that the importance of the Bay's ecosystem resources is recognized. Shallow water habitats, subtidal habitats, transition zones, adjacent uplands and their associated plants, animals and other organisms, provide essential "ecosystem services that support environmental, social and economic well-being." The Bay and associated marshes are indeed an integral part of the Bay Area community.

Completing Subregional Plans while carrying out their ongoing responsibilities will be daunting for local governments. As was made clear at the public hearing, local jurisdictions are greatly concerned about their ability to comply with expectations and about impacts on their functioning. Finding out that complying with CEQA is the responsibility of local governments adds yet another financial burden. Providing technical assistance, guidance, support and funding will be critical.

And how will it be assured that all jurisdictions will be held to the same standards? adequate RSAP and for each element as jurisdictions prepare their Subregional Plans. There is considerable potential for inconsistent analysis of habitats, habitat needs and habitat values and probably other elements in environmental review, depending on consultants hired. It will be essential for BCDC staff to apply standards uniformly so different sections of the Bay are not treated differently, to ensure natural resources are consistently protected, and that nature-based adaptation approaches are considered equally by each jurisdiction. For example, jurisdictions should not be allowed to move to a cheaper or easier or faster plan for hard-scape construction when nature-based alternative is an appropriate option, but may take more work or funding, or more complicated permitting to implement.

We also are concerned about whether there is sufficient area around the Bay to comply with all of the requirements presented in the RSAP: providing housing, transportation, maintain and expanding public access, and most importantly in our view, protecting the Bay ecosystem wildlife and their habitat.

Our comments on specific sections and issues:

1.4.2. Adaptation Strategies and Approaches

Page 31 - Adaptation Approaches – tidal marshes protect shorelines and provide many other services, as discussed in the RSAP. They should be included as a “Protect Approach” because they attenuate wave energy before reaching the shoreline. This is a further reason they should be protected and be included in this section.

As discussed on page 33, in addition to protecting shorelines, tidal marshes include habitat for endangered, special status and migratory species. They also recycle nutrients, improve water quality, and help improve air quality. For these reasons, they should be included in the discussion of benefits.

Page 32. Public Trust –

This discussion describes the public trust as “covering water related commerce, navigation, fishing, bathing, swimming, public access, recreational uses and preservation of lands in natural state.” A more accurate quote of the most recent legal decision (National Audubon Society v. Superior Court) in the 1980’ is “...one of the most important public uses of the tidelands and use encompassed within the tidelands trust is the preservation of those lands in their natural state, so that they may serve as ecological units for scientific study, as open space, and as environments which provide food and habitat for birds and marine life....” This expanded public trust doctrine includes protection of wildlife and habitat. So, to accurately describe public trust resources BCDC is responsible to protect, the wording should be revised to include wildlife and habitat, in addition to recreation. The phrase “preserving lands in a natural state” can be interpreted in different ways. It would best serve the public trust resources and the public to include in the explanation of the public trust that tidelands “serve as ecological units...provide food and habitat for birds and marine life....” The responsibility to protect wildlife and habitat should be carried through in the RSAP requirements, as we recommend below.

2.3.2. Ecosystem Health and Resilience

Following on BCDC’s public trust responsibilities, the discussion of ecosystem health should be expanded to include wildlife. No ecosystem is healthy or resilient without fish and wildlife. The Ecosystem Health and Resilience section (page 50) should be expanded to identify wildlife and fish as essential components of ecosystems. In addition to the ecosystem asset list on page 51, there should be a list of endangered, special status and wildlife, birds, fish and mammals that must be protected, and of representative resident and migratory species and the habitats they require.

It is important that all of the habitat components necessary to support the above species be protected and included in Subregional Adaptation Plans. Vegetated uplands are essential for endangered Ridgway Rails, Salt Marsh Harvest Mice and for many other resident and migratory species as refugia habitat during high tides when they must leave the marshes and are vulnerable to predation. For other species the uplands provide nesting and/or foraging habitat. This habitat component is not mentioned and It is not clear whether the ecotone habitat adjacent to tidal marshes, that is noted in the list on page 51 and discussed on page 53, is intended to cover these functions. The distinction is important because refugia habitat depends on the presence of vegetative cover. Adjacent uplands, ecotones and transition zones are sometimes used interchangeably. Transition zones are sometimes used to refer to broader areas of undeveloped land diked baylands. We completely agree about the importance of connecting habitats across the landscape to ensure they can support the movement of wildlife.

2.3.3 Development, Housing and Land Use

“Support the region creating affordable housing goals while preserving public trust uses” is vague. While providing housing is important, housing is not a public trust use and that should be clarified. Housing should be located away from tidelands. Sea level rise is another important reason housing should be located in uplands.

2.3.5. Public Access

“Balancing” the need for human enjoyment, sustenance (not sure what this means in this context) and cultural connection with healthy ecosystems is not appropriate or relevant. (page 62). The Bay has lost 90% its tidal marshes due to filling and diking. The extensive marsh restoration that has occurred in recent years has not made up these acreage losses. Actually, one would think that human enjoyment and cultural connections can best be achieved with healthy ecosystems. Ecosystems should not be included in a “balancing” program. Balancing would only lead to further losses of ecosystem habitats and species. Bicycle roads or trails are not public trust uses and should not be built over the bay waters or tidal marshes.

2.3.6. Transportation and Transit

Transportation facilities/structures are not public trust uses and should not be built on, over, in or upland habitats for wildlife adjacent to the Bay.

3.1.2 Element B. Existing Conditions

B2 Two additional elements should be included in this section and jurisdictions should be required to them in their Subregional Plans:

b. Coastal and Nearshore Hydrologic Conditions. As part of the description of tidal marshes in their communities, jurisdictions should be required to discuss and evaluate whether the marshes are functioning to protect shorelines. In their adaption planning, jurisdictions need to be aware of this connection and the importance of protecting the marshes in order to protect the shorelines.

c. Ecosystem Health and Resilience Conditions. The endangered and other special status species as well as resident, migratory waterfowl, and shorebirds, fish and Bay dependent mammals present in each jurisdiction should be identified in Subregional Plans and their habitat requirements should be described. In particular, adjacent upland refugia must be protected as part of tidal marsh habitats and essential cover habitat should be provided. Adjacent upland ecotones are included, but it is not clear they refer to high tide refugia or would have suitable vegetative cover.

D4. Adaptation Strategies. Retaining and/or restoring tidal marshes should be included as an adaptation strategy in recognition of their importance protecting shorelines.

PROCESS FOR AMENDING RSAP NEEDED

While a process for amending Subregional Plans is included, there is no provision for amending the RSAP. There will undoubtedly be advancements in scientific and technical knowledge, possibly changes in climate, species status and physical conditions (perhaps due to natural disasters such as earthquakes) and changes in adaptation methods and other requirements. The RSAP needs to provide for such changes by including guidelines and a procedure for amending Subregional Plans.


APPENDIX B: STAFF ANALYSIS OF PROPOSED REVISIONS TO CLIMATE CHANGE FINDINGS AND POLICIES

Finding W: Policy objective: "Protect, restore and enhance ecosystems..." This is the only clearly ecosystem protection component, yet it was deleted. This Policy Objective should be restored.

Policy 6 - Assistance is offered in many areas, but no assistance is mentioned as being provided to jurisdictions for environmental information. This could lead to inconsistent reporting, protection and management. If jurisdictions are on their own to obtain biological information, they will be obtaining information from a variety of consultants. We suggest that BCDC look into arranging a cooperative agreement with the California Department of Fish and Wildlife to provide current scientific information on Bay-dependent species and their habitat needs. This would best ensure that accurate, scientifically-sound information is provided to jurisdictions regarding Bay habitats and species to be protected; restored and managed.

Thank you for considering our input.

Sincerely,



Barbara Salzman, Co-chair
Conservation Committee

COMMENT #247

From: A. GORDON ATKINSON <info@bayareafloatinghomes.org>
Sent: Thursday, October 17, 2024 8:38 AM
To: BCDC PublicComment <publiccomment@bcdc.ca.gov>
Subject: RSAP

Reading Section 2.3.3 of the RSAP, local jurisdictions will be required to assess "Residential land uses, affordable housing sites, (and) housing element opportunity sites." It goes on to urge them to "support the region in creating affordable housing and meeting state-mandated housing goals.....and reducing flood risk and other hazards that may worsen with sea-level rise." The following page asks that they "include effective measures that address changing future flood risks, such as plans and policies that result in development and infrastructure that is resilient to sea level rise and adaptable over time." The first paragraph of this section states the context of these recommendations, saying: "Future land use decisions along the shoreline will need to balance the need to increase housing production, preserve existing housing, and maintain a strong economy with managing risk — not just along the shoreline, but inland from the shoreline as well." I would like to urge the Commission to expand this recommendation to specifically include private, residential development on the bay, i.e. buoyant architecture- something which has successfully been accomplished in numerous places around the world already and has become a burgeoning new housing type in response to global struggles for solutions to lack of affordable urban land. Our organization, Bay Area Floating Homes, a local, non-profit, development corporation, believes the time has come for the Bay Area to join this movement. We are advocating for allowing floating structures only where it's environmentally benign, avoiding areas with healthy marshes and eelgrass and those targeted for restoration. Furthermore, floating structures should be socially beneficial, providing affordable housing, good connectivity to shore communities and maintaining public shoreline access. We propose floating structures be held to stringent sustainable design standards and be given priority if they intentionally provide substrate for underwater habitat and water filtration features as well as public amenity components. Floating structures can meet all these criteria while providing much-needed affordable homes that are resilient to earthquakes and fires. The RSAP is a thoughtful, comprehensive and visionary document whose agenda we fully support, but we must be bold and willing to innovate if we are to successfully meet the social and environmental challenges that face us today. We now ask that a provision for affordable, sustainable, resilient floating homes be included in the RSAP.

A Gordon Atkinson, AIA
President, BAFH, Inc.
735A Taraval St.
San Francisco, CA 94116
415-731-9927
agordonatkinson.com

COMMENT #248

PDF – San Mateo County Flood and Sea Level Rise Resiliency District (OneShoreline)



October 18, 2024

San Francisco Bay Conservation and Development Commission (BCDC)
375 Beale Street, Suite 510
San Francisco, California 94105

To whom it may concern:

I write on behalf of the San Mateo County Flood and Sea Level Rise Resiliency District, also known as OneShoreline, to provide comments on the September 16 Public Draft of the Regional Shoreline Adaptation Plan (RSAP). We applaud BCDC's leadership and holistic approach to long-term sea level rise resilience as demonstrated by the comprehensive process to develop the RSAP and the document itself, which will be a vital tool to support locally driven, regionally synchronized efforts.

We appreciate BCDC's review of our input on the July 10 Draft Plan, and that several of our comments were addressed in the most recent draft, including defining "What this document is and is not" and "How to use this document" as well as consolidating terminology in some key areas to make the guidance easier to understand. Meanwhile, several of our earlier comments, including the following key ones, remain.

- While we see that there is an effort to define language used in the RSAP on page 36 of the Public Draft, we continue to find the use of the term "adaptation strategy" to be unintuitive and difficult to understand, especially when also used with "adaptation pathway" and "strategic approach" (or "strategic adaptation approach" or "adaptation strategy approach" referenced in other locations). We find that project and planning practitioners (e.g. City Public Works and Planning Department staff) often think in terms of "projects" and thus we recommend that BCDC incorporate the term "project" into the RSAP language rather than "adaptation strategy," especially in Element D. These "projects" can be phased based on an "adaptation pathway" and take different approaches (e.g. protect, accommodate, avoid/relocate).
- OneShoreline supports Element E, Land Use and Policy Plan, which prompts jurisdictions to outline the land use changes necessary to implement shoreline adaptation projects. We highly recommend that the RSAP makes this crucial link between land use and projects more explicit by consolidating Elements D and G, and making the relationship between Elements D, E, and F clearer, i.e. that Element D prompts jurisdictions to focus on "projects," Element E prompts jurisdictions to focus on land use, and Element F prompts jurisdictions to relate how "projects" and land use policies can be implemented in tandem over time to enable adaptive resilience ("adaptation pathways").
- Element D, Adaptation Strategies and Pathways, includes requirements for a Subregional Shoreline Resiliency Plan that appear to be similar to completing an alternatives analysis and selecting a preferred alternative, all of which requires extensive data collection, coastal hazard modelling, coordination with the public and stakeholders, and may be perceived as pre-empting CEQA. Thus, OneShoreline recommends that BCDC require local jurisdictions to identify "high-priority projects" to achieve its resilience objectives rather than a "preferred adaptation strategy" approach.
- Another reason to avoid requiring jurisdictions to select a "preferred" alternative prematurely is that this decision may not be informed by detailed coastal hazard modelling that includes wave run-up. While we see that BCDC encourages jurisdictions to incorporate wave run-up into their plans if local modeling exists (page 131), this is not a requirement, and many jurisdictions do not have such local modeling on hand unless they are actively designing a shoreline project. Based on our experience planning sea level rise shoreline project in urban and constrained landscapes, wave run-up is a key part of assessing a project's ability to address RSAP's Coastal Flood Hazards and Sea Level Rise Scenarios standard.

While we are hopeful that the RSAP will begin the urgently needed movement to more meaningfully incorporate land use policy into sea level rise shoreline adaptation projects, much more work on this front remains. We have witnessed multiple projects along San Mateo County's shoreline be permitted and built that severely limit our options to responsibly and sustainably adapt to sea level rise. The current environmental regulatory permitting regime, of which BCDC is a critical part, allows private and public agency development right up to the water's edge, making it much more difficult and costly to build resilience, especially resilience that utilizes natural infrastructure. We are already looking ahead beyond the RSAP and are keen to work with BCDC staff and other partners to reevaluate and expand BCDC's authorities to, within its 100-foot jurisdiction, compel resilience for assets and land uses beyond public access.

The following three pages provide more detailed comments on the Draft RSAP. If you wish to discuss the contents of this letter and the attached pages, please contact OneShoreline Project Manager Makena Wong. And again, thank you for undertaking this critically important effort.

Sincerely,

A handwritten signature in blue ink, appearing to read "Len Materman", with a long horizontal flourish extending to the right.

Len Materman
Chief Executive Officer

Attachment

Section 1.4.2 Adaptation Strategies and Benefits Beyond Flood Risk Reduction

- Terminology related to nature-based solutions (e.g. “natural and nature-based adaptation” in Figure 1-7 on page 29 and the use of “nature-based infrastructure” in Figure 1-8 on page 30) are not clearly defined before use.
- While we see that there is an effort to define language used in the RSAP on page 36 of the Public Draft, we continue to find the use of the term “adaptation strategy” to be unintuitive and difficult to understand – especially when also used with “adaptation pathway,” and “strategic approach” (or “strategic adaptation approach” or “adaptation strategy approach” referenced in other locations), which can get wordy. In our work, we find that project and planning practitioners (e.g. City Public Works and Planning Department staff) often think in terms of “projects” – we highly recommend that BCDC incorporate the term “project” into the RSAP language rather than “adaptation strategy.” These “projects” can be phased based on an “adaptation pathway” and take different strategies (e.g. protect, accommodate, avoid/relocate). See our suggested key terms and definitions below:
 - **Adaptation Strategy:** “The suite of either physical or non-physical strategies that – in tandem and/or in sequence – guide a community’s response to sea level rise and coastal flooding. For the purposes of the RSAP, there are five adaptation strategies: 1) Protect – creating physical barriers to reduce risk, 2) Avoid – limiting exposure to the hazard, 3) Accommodate – minimizing the consequences of the hazard when exposed, 4) Avoid/Relocate – siting development out of areas exposed to the hazard, and 5) Prepare – build capacity of government, sectors, and communities, including capacity to participate in adaptation decision-making.”
 - **Project:** “Built shoreline infrastructure with a design life, coastal hazard design condition, and estimated cost that decrease risk from sea level rise and coastal flooding. Projects can utilize “green” infrastructure, “grey” infrastructure, or a hybrid of these approaches to provide flood risk reduction benefits while also supporting natural habitats and other ecosystem services.”
 - While “protection” may seem to be the most obvious project adaptation strategy, projects can relate to any of the first four strategies listed in the “Adaptation Strategy” definition above; for example, the construction of a shoreline park with phased relocation of conflicting development structures over time can be a “Project.”
 - **Land Use Changes:** “Updates to planning documents, policies, codes, and practices that support projects (or eliminate the need for them), including zoning overlay districts, building standards, establishment of setbacks or buffers, shifts in density (e.g. Transfer of Development Rights programs, conservation zones), or shoreline infrastructure requirements for new private development.”
 - **Adaptation Pathway:** “Implementation of adaptation strategies – through both projects and land use changes – over time. Comprised of discrete, manageable steps, that can be sequenced – and adjusted to respond to coastal flood risks – as sea levels rise. This approach relies on monitoring the effectiveness of strategies and changing physical and social conditions, and developing triggers and decision-points that signal when changes to the pathways need to occur.”
- A primary motivation for outlining the key terms and definitions above was to make the critical relationship between projects and land use explicit in the RSAP, as we see this as one of the more

impactful perspective shifts that this framework provides. From our perspective, Element D prompts jurisdictions to focus on projects, Element E prompts jurisdictions to focus on land use, and then Element F prompts jurisdictions to clearly relate projects and land use by seeing how changes can be implemented over time through adaptation pathways. We recommend that this relationship between Elements D, E, and F is made clearer.

Section 3.1.3, Element C: Vulnerability Assessment

- Page 99, Requirement C1-b: While the Adapting to Rising Tides Flood Explorer is offered as a resource, it is still not entirely clear if a site-specific coastal hazard study needs to be completed to meet this requirement. Recommend that this is further clarified.
- Pages 100-103: Even with the detailed call-out boxes defining these terms, it is difficult to intuitively understand what “assets and areas of significance” is versus a “priority action area.” Recommend that the Element C requirements are re-framed and simplified according to the following analysis flow:
 - Complete exposure analysis for entire planning area.
 - Based on the exposure analysis, identify high priority areas.
 - For these high priority areas, require a more detailed sensitivity and adaptive capacity analysis, and require that projects proposed in Elements D/G address the vulnerabilities in these areas.

We consider this flow more intuitive since it follows the process taken in the [San Mateo County Sea Level Rise Vulnerability Assessment](#), which completed a countywide exposure analysis (resulting in a series of maps and inventories) and a set of [Asset Vulnerability Profiles](#), which completed a more detailed sensitivity and adaptive capacity analysis of specific, high-priority assets throughout the county.

Section 3.1.4, Element D: Adaptation Strategies and Pathways

- We recommend that the term “Project” replace the term “Adaptation Strategy” throughout, and that the Element G Project List requirement is moved to the Element D requirements, so Element D is more clearly defined as a project-related element.
- The requirements throughout Element D seem equivalent to completing an alternatives analysis for a shoreline project, which could be burdensome for jurisdictions that have not yet scoped or brought on consultant support to complete such a study along its shoreline. A site-specific alternatives analysis that identifies a preferred project alternative requires detailed data collection, coastal hazard modeling (including modeling of wave run-up), and extensive coordination with the public and stakeholders. In addition, there are complications if it is perceived that a jurisdiction is identifying a preferred project alternative before completing environmental clearance and permitting milestones (e.g. the Environmental Impact Report required by CEQA or the 404(b)(1) analysis identifying the Least Environmentally Damaging Practicable Alternative required by the RWQCB and USACE). Recommend the document provides further clarification on what level of detail is expected for this alternatives analysis. Recommend that BCDC consider requiring local jurisdictions to identify “high-priority projects” that relate Requirements F1-b and Element G, rather than a “preferred adaptation strategy approach.”

Section 3.1.6, Element F: Project Implementation Plan and Funding Strategy

- We recommend that Requirement D4-b is moved to Element F and integrated with Requirements F1-b and F3-a. Project implementation should include both projects (as outlined in Element D) and land use changes (as outlined in Element E) phased in the form of an adaptation pathway over time. This helps Element F be more clearly defined as an implementation and adaptation pathway-related element that marries Elements D and E.

Section 3.2.1, Coastal Flood Hazards and Sea Level Rise Scenarios Standard

- Page 129, Why are there different requirements for sea level rise scenarios to use for the Vulnerability Assessments (Element C) and for Adaptation Strategies and Pathways (Element D)? Recommend that the sea level rise scenarios required for the Vulnerability Assessment are consistent with those required for Adaptation Pathways (e.g. consider removing the 4.9-foot sea level rise scenario as a Vulnerability Assessment requirement).

Section 3.2.4, Adaptation Strategy Standards

- The Adaptation Strategy Standards still feel out of context. Recommend that the connection to the Strategic Regional Priorities be made clearer, so jurisdictions understand where they are coming from.

COMMENT #249

PDF - Santa Clara Valley Water District

October 17, 2024

R. Zachary Wasserman, Chair
San Francisco Bay Conservation
and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105

Submitted Electronically via Email: publiccomment@bcdc.ca.gov

RE: Regional Shoreline Adaptation Plan (RSAP)

Dear Chair Wasserman,

The Santa Clara Valley Water District (Valley Water) appreciates the opportunity to provide comments on the San Francisco Bay Conservation & Development Commission's (BCDC) efforts to develop the Regional Shoreline Adaptation Plan (RSAP). Valley Water serves as a water supply, flood risk reduction, and environmental stewardship agency at the forefront of climate change adaptation. As part of our commitment to this mission, we are leading numerous climate resilience projects such as the South San Francisco Bay Shoreline Project, which will restore 2,900 acres of former salt ponds and improve the region's protection from sea level rise through nature-based solutions like ecotone levees. Additionally, Valley Water, as a groundwater sustainability agency, values BCDC's recognition of the need for regional predictions of shallow groundwater response to sea-level rise. With this in mind, we offer the following comments in support of the RSAP.

General Comments

As the special district responsible for water supply, flood protection, and environmental stewardship in Santa Clara County, Valley Water strongly supports cross-jurisdictional sea level rise planning and commends BCDC's work on the RSAP. Valley Water possesses important expertise in developing and implementing complex, multi-jurisdictional projects along the shoreline and maintains partnerships with local, regional, state, and federal agencies involved in sea level rise adaptation. As such, Valley Water's participation in the preparation of Subregional Plans in Santa Clara County is critical to ensuring their effectiveness and that future sea level rise adaptation projects are implemented in coordination with ongoing and planned Valley Water projects, including the South San Francisco Bay Shoreline Project and Calabazas/San Tomas Aquino Creeks-Marsh Connection Project. We recommend that the participation of agencies with flood protection and shoreline stewardship responsibilities be a clearly identified requirement of Subregional Plans.

We encourage reliance on locally refined data and projections, where available, as best available data to address the challenges of sea level rise. Where regional models are used, we encourage additional description of model limitations. Like all models of complex natural systems, the USGS CoSMoS groundwater model includes simplifying assumptions that may not align well with all potential uses.

Valley Water is drafting a comprehensive report that, in part, estimates groundwater response to sea-level rise in Santa Clara County. We anticipate this report will be publicly available by early 2025. We hope it will be useful to BCDC and other Bay Area jurisdictions by providing a comprehensive understanding of South Bay shallow groundwater dynamics in response to tides, seawater intrusion, and sea-level rise.

Specific Comments

1. Section 1.4.1 The Science of Sea Level Rise and Coastal Flood Hazards

- It appears that 2020 is the baseline year used for sea levels based on Figure 1-2. We recommend stating the baseline year in text for clarity.
- Figures 1-3 and 1-4: Please add the full citation for USGS (2021) and text explaining the limitations of these figures. While most hydrologic experts understand there is considerable uncertainty in these types of maps, many readers may not. Helpful disclaimers could be added, similar to what CoSMoS uses, such as: "...intended for use as a screening tool to identify locations that may experience increasing groundwater hazards as seas rise" and "...results are sensitive to the choice of geology and do not reflect geologic variability at the local scale; thus, individual regions may vary significantly from predictions" per <https://ourcoastourfuture.org/science-and-modeling/>.
- Figure 1-3: The extent of groundwater emergence in Santa Clara County is likely overestimated in this map. The areas shown typically have considerably more than 0.8 feet depth to groundwater and do not have groundwater emergence under present day extreme tides or storm events, largely because of the thick clay layers. Also, some of the emergent groundwater shown is far from the Bay and not realistically influenced by tides or sea-level rise.
- **Sea Level Rise Worsens Existing Coastal Flooding Hazards (pages 26-27)**
 - i. Page 26, Paragraph 2
 - We recommend changing "tidal range" to "tidal extent" or "extent of tidal influence" since "tidal range" refers to the difference between high and low tide.
 - We recommend softening the statement "As sea levels rise, tidal range of the shoreline will move inland..." to indicate this "could" or "is likely to" occur because the rate and spatial extent of sedimentation around the Bay may increase as sea levels rise to closely match the rate of sea level rise. Increased sediment fluxes may maintain current tidal marsh habitats or restore previously altered habitats such that tidal ranges and extents are not altered significantly. For example, several South Bay habitat restoration

projects in the planning stage could greatly increase sedimentation rates and restore over 10 square miles of tidal marsh as nature-based adaptation strategies for sea level rise. Another example is the recent tidal restoration of 3,400 acres of farmland at Lookout Slough in Solano County.

ii. Page 26-27

- We recommend noting that another potential mechanism of seawater intrusion is the infiltration of saltwater beneath tidal streams (this occurs in the South Bay in Santa Clara County). Inland tidal migration driven by sea level rise will also increase the risk of seawater intrusion beneath tidally influenced streams.

iii. Page 27, Figure 1-5

- We recommend modifying the figure to portray less groundwater rise than sea level rise. The figure appears to correlate a high tide, 100-year storm, and sea level rise plus 100-year storm surface water elevations to equivalent increases in groundwater elevations. The 1:1 correlation of surface water and groundwater elevations implied by the figure is not observed in South Bay aquifers due to fine-grained "Bay Mud" sediments, the spatial and vertical extent of which vary locally and throughout the Bay Area.

2. Section 1.4.2 Adaptation Strategies and Benefits Beyond Flood Risk Reduction

- Figure 1-6: We recommend adding the failure of a berm or levee to the hazards included in the calculation of flood risk.

3. Section 2.2 Strategic Regional Priorities for Region-Wide Action

- Page 43: We recommend adding a caption and figure number to the list of Strategic Regional Priorities. In a caption, we suggest explaining if the list is prioritized.

4. Section 2.3 Topic Areas — Regional to the Local Perspective

- We suggest clarifying in text that topic areas are the issues that will be addressed to improve upon priority areas. Adding a figure to illustrate the relationship between the two, plus the other items (e.g., assets to be analyzed, adaptation standard/strategy, elements) would also be helpful.
- Maps included in Section 2.3 lack titles and do not specify the units used in the scales.

5. Section 2.3.4 Critical Infrastructure and Services

- Page 60: This map would be more helpful if it aligned more closely with the assets to be included in Subregional Shoreline Adaptation Plans listed on page 58.

6. Section 2.3.7 Shoreline Contamination

- Page 70: We recommend replacing the reference to "groundwater shoaling" (the only one in the report) with "groundwater rise" for report consistency and to avoid confusion for readers who may not be familiar with the term "shoaling".

7. Section 3.1.1 Element A: Planning Process

- Since Valley Water is the water supply and flood management agency for Santa Clara County, we feel that Valley Water's inclusion in planning project teams should be required. More broadly, we recommend adding language that Subregional Plan leads are required to include special districts if they have direct responsibility over coastal land management, groundwater sustainability, and/or flood protection.

8. Section 3.1.2 Element B: Existing Conditions

- Page 90, B2a, Physical conditions: We recommend adding a requirement to describe the depth to, and thickness of, shallow aquifers; clay layers other than Bay mud; and the degree to which aquifer units are interconnected or spatially extensive. The hydrogeology and subsurface lithology of the Bay coastline are extremely complex and variable over very short distances. Shallow groundwater rise and emergence will largely be determined by the subsurface geology and hydrogeology.
- In Element B, we recommend including a requirement to describe shallow groundwater pumping near the Bay including dewatering, beneficial use, and pumping at contamination sites. This pumping has implications for both existing and future conditions as it could cause brackish shallow groundwater and/or surface water to intrude into aquifers further inland, affecting water supply aquifers. Adaptation strategies for managing shallow groundwater rise should avoid causing water quality issues and vice versa. Pumping/dewatering of shallow aquifer systems adjacent to the Bay may cause unintentional undesirable conditions, such as seawater intrusion, that can contaminate or threaten water supplies. The degree to which shallow aquifers are being pumped will also have implications for Element C: Vulnerability Assessment.
- Page 92: In B3.a., we recommend including unsheltered people as part of the "vulnerable communities" that must be mapped and described.

9. Section 3.1.4 Element D: Adaptation Strategies and Pathways

- We recommend providing an example of conceptual alternatives that would satisfy D2, to give readers an idea of level of effort. For example, we wonder if existing studies, such as the South San Francisco Bay Shoreline Study conducted for Economic Impact Areas 1-10, sufficiently identify adaptation strategy alternatives.

10. Section 3.2.1 Coastal Flood Hazards and Sea Level Rise Scenarios Standard

- Page 128, first bullet: We recommend indicating that the maximum of 6.6 feet scenario footprints be used for minimum landward boundary for clarification.
- Table 3-1: Is there a citation that could be provided for the 100-year storm surge estimate of 3.5 feet? We understand that this would vary spatially but assume that 3.5 feet is an average number recommended as an approximation of the 100-year storm surge.
- Table 3-1: We recommend not requiring the 4.9 feet analysis in Element C. The other three scenarios give the near-term and the long-term conservative SLR

planning range since the low SLR scenario is actually still the “intermediate” potential outcome. The intermediate to high planning range should suffice for communicating vulnerability. The addition of a third 2100 scenario likely does not provide significant new vulnerability information.

- We recommend briefly addressing how the RSAP’s sea level rise scenarios are intentionally simplified to make it easy for communities to conduct the risk/vulnerability assessments. For example, storm surge is spatially variable across the nine Bay Area counties.
- Page 130, Shallow Groundwater and Groundwater Emergence box: We recommend describing why 4 inches of groundwater change was selected to define the groundwater rise hazard area.
- Page 131, definition of shallow groundwater: We recommend describing why 9 feet was selected to define shallow groundwater, as opposed to 10 feet or a rounded value related to the sea level rise scenarios (0.8, 3.1, 4.9, or 6.6 ft).
- Page 133, Table 3-4 Statewide Averages and Regional Available Data
 - Table 3-4 Groundwater Rise (USGS CoSMoS) should reference 'USGS CoSMoS-GW' as these data are from the MODFLOW groundwater model and not surface water.
 - Table 3-4 shows groundwater rise values that are the same or greater than corresponding sea level rise. As noted previously, an assumption of a 1:1 relation between sea level rise and groundwater rise may overestimate groundwater rise for many Bay Area aquifers. The CoSMoS groundwater model assumes uniform, permeable sediments (alluvium) to a depth of 50 meters (Befus et al, 2020¹). However, the shallow subsurface around the Bay is often dominated by fine-grained clays and silts. For example, within the top 150 feet of monitoring well 06S02W05F003 in Palo Alto, total aquifer thickness is only 13.4 feet. Under these conditions, groundwater rise is not expected to match the magnitude of sea level rise. Most Groundwater Sustainability Plans or Alternatives developed by Groundwater Sustainability Agencies around the Bay describe vertically extensive clay aquitards adjacent to the Bay.
 - Under existing conditions (0 ft of SLR), the area of northern Santa Clara County depicted as having emergent groundwater has very localized and transient emergence based on field observations and local groundwater level monitoring. Given the regional, screening nature of CoSMoS, we recommend encouraging local agencies to use more localized models or data developed or approved by local Groundwater Sustainability Agencies.

11. Section 3.4 Plan Development, Submission, and Approval Process

- Table 3-8: Valley Water strongly recommends the addition of a column to identify special districts, groundwater sustainability agencies, and/or JPAs with responsibility for flood protection and shoreline stewardship. The table should indicate that they must be planning partners during the preparation of Subregional

¹ Befus, K.M., Barnard, P.L., Hoover, D.J., Finzi Hart, J.A., Voss, C.I., 2020, Increasing threat of coastal groundwater hazards from sea-level rise in California, Nature Climate Change, 16 pages.

Plans. Doing so would help to clearly indicate and formalize the role of such entities prior to the start of subregional planning processes.

Valley Water appreciates BCDC's commitment to addressing the challenges posed by sea level rise and groundwater dynamics through the development of the RSAP. We believe that by incorporating the suggested comments, the RSAP can become a more effective tool in fostering regional collaboration and ensuring that local agencies can implement scientifically sound and adaptable strategies to mitigate the impacts of sea level rise.

Thank you for your consideration of our comments. Should you require any additional information or clarification, please feel free to contact me at jbourgeois@valleywater.org. We look forward to collaborating with BCDC on future efforts to enhance the resilience of the Bay Area's shoreline.

Sincerely,

A handwritten signature in black ink, appearing to read 'John Bourgeois', with a stylized flourish at the end.

John Bourgeois
Deputy Officer
Division of Watershed Stewardship and Planning

COMMENT #250

PDF – Peninsula Accountability for Contamination Team

San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105

October 18, 2024

RE: PACT Public Comment on BCDC's Regional Shoreline Adaptation Plan & Contaminated Sites Management

Dear Bay Conservation & Development Commission,

The Peninsula Accountability for Contamination Team (PACT) is writing to provide comments on the Regional Shoreline Adaptation Plan and specifically how it addresses the issue of contaminated sites and environmental justice concerns in the Bay Area. **PACT's mission is to advocate alongside community members to advance contaminated site clean-up and infrastructure resilience, addressing the impacts of sea level and groundwater rise in low-lying areas of the Peninsula and beyond. Through this work, we aim to safeguard the health and well-being of our community for generations to come.** We commend BCDC's effort on the RSAP, an important document that will guide the future adaptation practices of our region and an indispensable step in advancing environmental justice. We appreciate the opportunity to participate in the public comment process. PACT member organizations include Climate Resilient Communities, Nuestra Casa, Youth United for Community Action, Belle Haven Empowered, and the Belle Haven Community Development Fund. The longer these shoreline-contaminated sites remain untreated, the greater the risk of contaminants spreading to the Bay and surrounding habitats. This means that all Bay Area jurisdictions should be required to contribute to the cleanup effort.

PACT priorities:

- Advance timely and comprehensive clean-up of shoreline contaminated sites located in and adjacent to vulnerable communities.
- Empower affected communities to have an active voice in determining the prioritization of contaminated site cleanups and resource allocation.
- Strengthen coordination between regulatory agencies, BCDC, responsible parties, and local jurisdictions to accelerate the clean-up of contaminated sites impacted by groundwater, sea level rise, and coastal flooding.

To address these priorities and to be fully protective of the health of current and future frontline community residents, PACT recommends the following improvements to the RSAP and the RSAP implementation process:

1. **Emphasize history of and use policies & urgency of clean-up:** BCDC should explicitly acknowledge how past land use planning practices (e.g. redlining and de facto discrimination) contributed to the concentration of contaminated sites in lower-income communities of color and how the RSAP, Subregional Plans, and shoreline adaptation efforts must both acknowledge these inequities and ensure that both clean-up efforts and general adaptation plans prioritize the health, social cohesion, and livelihoods of frontline communities. RSAP language should also put a greater emphasis on the urgency of contaminated site clean up. The presence of these contaminated sites

contributes to the continued spread of toxic substances into the Bay, which impacts human health and our natural ecosystems.

2. **Update combined flood risks, groundwater, and contaminated site maps:** The RSAP effectively acknowledges the risk of shallow groundwater rise across the region, and we look forward to the updated ART Flood Explorer incorporating groundwater rise. Still, we recommend that BCDC's flood mapping tool incorporate projections of flood extents in the case of overlapping or simultaneous coastal flood events. Using flood overlays without acknowledging combined flood risk may lead to a subregion underestimating flood hazards which could significantly change their adaptation approach.

In addition, we would like the contaminated sites map (page 72) to be updated to include current stormwater flood zones, groundwater rise risk, contaminated sites that are located just outside of census tracts with a CalEnviroScreen score of 75 or greater, and high-risk [closed sites](#) that could still contribute to contaminant mobilization and health impacts (see SPUR's [Look Out Below](#) Report). In East Palo Alto, most contaminated sites are located in the City's northeast industrial corner near Bay Road. This census tract has a CalEnviroScreen score below 75 but is adjacent to a vulnerable community. According to this map, even a cluster of sites that falls just a few hundred feet outside of a designated EJ community might not qualify for additional resources yet still impact nearby residents through contamination mobilization. These sites should not be excluded from assessment due to arbitrary census boundaries and a metric of social vulnerability (CalEnviroScreen) that does not always accurately represent a community's experience. The use of the map should be clarified: are the sites identified on page 71 the only ones that require assessment? Please provide further guidance.

3. **Encourage community-led site prioritization:** The RSAP should recommend that subregional coalitions work with community-based organizations and the local community to prioritize clean-up sites across the subregion. With limited financial resources available for shoreline cleanup, prioritization of sites will be key. Climate Resilient Communities has already developed a tool that could be used as a template for community prioritization in the face of climate hazards.
4. **Include structures for accountability & enforcement:** Clear metrics of success and pathways for accountability will better enable subregions to meet goals around shoreline contaminated site clean-up. A recurring challenge is that responsible parties often find loopholes to avoid paying for site cleanup. There is an urgent need for frameworks that hold them accountable. We recommend that BCDC provide additional guidance on how local jurisdictions and community organizations should work with responsible parties and close these loopholes to expedite site cleanup.

Finally, please provide clarity on PACT's following concerns:

- How will BCDC help foster relationships between local jurisdictions and regulatory agencies that oversee contaminated sites? BCDC cannot direct key regulatory agencies like the DTSC, State Water Board, and EPA to participate in subregional planning. Yet, these agencies are integral to addressing shoreline contamination.

- How will BCDC support low-resourced jurisdictions in addressing shoreline contamination? The RSAP would be strengthened by offering clear strategies and support structures to ensure that smaller and under-resourced jurisdictions, that may also have a high proportion of contaminated sites, receive adequate support.

The RSAP provides a valuable framework for addressing contaminated sites, public health issues, and environmental justice in the Bay Area. We are grateful to see contaminated site clean-up as a regional priority in the RSAP. Now, we ask the BCDC to provide additional structure and thinking for how the region and subregional plans can feasibly reduce community exposure to contamination in the face of climate change. Thank you for your time and consideration.

Sincerely,

Peninsula Accountability for Contamination Team (PACT)

COMMENT #251

Date: October 18, 2024

To: San Francisco Bay Conservation and Development Commission

Email sent to: publiccomment@bcdc.ca.gov

Re: RSAP – Public Comment on the Regional Shoreline Adaptation Plan

Draft for Public Comment (September 2024)

Dear Chair Wasserman, Vice-Chair Eisen, and Members of the Commission,

I want to thank everyone who has worked so hard on developing the Draft Regional Shoreline Adaptation Plan (RSAP). It is a colossal task and a vital undertaking. The draft is inspiring and strong in many ways, especially its collaborative aspects. I believe changes could further strengthen the plan, as with all drafts. I fully support the changes recommended by the Confederated Villages of Lisjan Nation, Sierra Club SF Bay Area Chapters and Sierra Club California, San Francisco Bay Shoreline Contamination Cleanup Coalition, Citizens for East Shore Parks, and Sally Tobin's recommendation that land use for undeveloped SF Bay shoreline is restricted to public use and Natural and Nature-Based solutions (NNBS).

I believe a public education program would strengthen the public engagement and equity elements of the RSAP and the plan as a whole, its implementation. The public engagement and equity elements in the RSAP are a very good start, and the new hires announced at BCDC's October 17 meeting will improve and expand the ability of BCDC to engage, work with, learn from, and guide cities through the adaptation processes. From my personal experience working on the Ocean Protection Council's Sea Level Rise Adaptation Planning Grant application with the City of Richmond, the technical assistance offered by Coastal Quest was instrumental in the city's successful application for the grant. In anticipation of the OPC grant funding, the City of Richmond also held a city-wide Sea Level Rise Community Conversation with speakers on policy, funding, and the science of sea level rise and shoreline adaptations, with a focus on nature-based solutions, specific to Richmond's shoreline. From working on the grant application and the community conversation, I believe that including in the RSAP regional and city-wide education programs about sea level rise and adaptations with implementation plans and assessments of the education programs, would greatly strengthen the RSAP and its implementation, and the public participation in and understanding of the development of the RSAP going forward. While most Bay Area residents, city staff, and local elected officials believe in sea level rise, most do not know how it will impact our shorelines, toxics buried in our shorelines, the ecology of the SF Bay, or about adaptations, especially nature-based solutions.

For the RSAP draft document, "current values" of residents, with attention to socially vulnerable and environmental justice communities, were surveyed. "Values" is not defined in the RSAP, but it seems to be a placeholder for preferences for the most part. Answers to questions concerning values/preferences depend on context, on what we know about the organization and/or representatives asking the questions, the context in which they are asked, and what we know about the topics we are asked about. Most residents answered the surveys with little or no knowledge about the RSAP or BCDC, the science of sea level and groundwater rise, toxics on our shorelines, or adaptations, especially nature based solutions.

As an example of the issue, in advance of Richmond's Community Conversation, a consultant for the city wanted to survey the participants in the community conversation, half-way through the event, on the "assets" on the Richmond shoreline they want to protect from sea level rise. Presumably, this data would have been used as part of a community preferences report for adaptation planning. Most participants could not have meaningfully participated in the survey about sea level rise preferences without, at the very least, a basic understanding the science of sea level and groundwater rise and how they relate to the ecologies of Baylands and the SF Bay and toxics on our shoreline, as well as the different kinds of adaptations and their challenges and benefits, especially nature based solutions. Many residents, elected officials and consultants who attended the Community Conversation expressed appreciation for the opportunity to learn about the policies, funding and science of adaptations and expressed interest in more information. I believe a regional and city-wide education programs as part of the RSAP would be welcomed and improve the value of surveys of and other forms of public engagement in the adaptation planning and implementation processes.

In conclusion, regional and city-wide education programs would strengthen the public engagement and equity elements of the RSAP, the trust of residents in the regional and local adaptation processes, and the ability of residents to engage in the development of the RSAP and local adaptations, as well as the value of public engagement to the work moving forward.

Sincerely,

Pam Stello
Richmond, CA

COMMENT #252

PDF - Sierra Club and the Citizens Committee to Complete the Refuge



Letter sent via electronic mail only

Jaclyn Perrin-Martinez Delivered
SF Bay Conservation and Development Commission
Email: jaclyn.perrin-martinez@bcdc.ca.gov

10/18/2024

Re: Comments on Public Draft of the Regional Shoreline Adaptation Plan

Dear Ms. Perrin-Martinez,

The Sierra Club and the Citizens Committee to Complete the Refuge appreciate the opportunity to provide comments on the public draft of the Regional Shoreline Adaptation Plan (RSAP). Several of us have been on the Advisory Committee as well as some subcommittees, and are deeply appreciative of staff's response to our concerns and suggestions. The rapid time frame required by SB 272 for so complex a document did not lend itself to full discussion of all the elements in the RSAP Advisory Committee process, so we have endeavored to provide more comprehensive feedback by way of this letter.

We do want to express our appreciation that the draft RSAP recognizes the importance of the Bay itself, not just its beauty, but also its biodiverse ecosystems and the many ways our communities depend upon the benefits provided by a healthy and thriving Bay. It is essential to preserve a healthy Bay in the face of sea level rise, not only for the Bay itself, but also for our communities' health and for the economic health of the Bay Area. Similarly, the wellbeing of our frontline, environmental justice communities is crucial to the thriving and resilient Bay Area. We appreciate the comprehensive integration and application of the Equity Assessment Standard throughout the RSAP.

We start our letter with a narrative section that discusses the following:

1. problems with the structure of the RSAP,
2. the need to more fully explain why it is essential to use NNBS (Natural and Nature Based Solutions) for sea level rise adaptation in order to preserve the Bay's health and in explaining why it is essential to make Bay health a core consideration throughout the RSAP and at every step of planning and implementation of Subregional Shoreline Adaptation Plans (SRSAPs),
3. the need for the RSAP to recognize ecosystem health and NNBS in all Strategic Regional Priority (SRP) topic areas and Strategic Plan Elements,
4. the insufficiency of the RSAP's guidance and requirements relating to how SRSAPs should address contaminants and how groundwater issues threaten to exacerbate the contaminant issue,
5. the lack of metrics or measurable goals to inform the development of SRSAPs and provide benchmarks to measure the degree to which we are achieving region-wide goals of holistic adaptation to sea level rise and the need to ensure adaptation projects are captured in the

6. EcoAtlas - Section G1B should clarify that the “Regional Project Database” is the SFEI EcoAtlas database.
7. Attachment A. is entitled Glossary in which we suggest additions to your current RSAP Glossary. While your Glossary provides some help to readers in explaining terms with which they are not familiar, there are many others (even Natural and Nature Based Solutions, NNBS) that are not mentioned. We make some suggestions to help expand the Glossary and make it more useful to readers and planners.
8. Attachment B is a spreadsheet of our comments on specific parts of the RSAP. Considering the complexity of the issue and the short time frame, it is not surprising that there will be grammatical and editorial issues. Many of these comments address such issues. But these can be significant if the error can lead to confusion or misinterpretation. Other comments refer to suggested edits for specific sections of the Plan and Guidelines.

Again, thank you for the opportunity to submit these comments and we congratulate the staff and BCDC for emphasizing the importance of a healthy Bay as well as centering equity in all elements of the RSAP.

Please note that unless specifically defined otherwise, when we use the term “sea level rise” we are including groundwater rise and storm surge, i.e. total water levels.

1) The Confusing Structure of the RSAP

Our organizations are well aware of the difficult task that has been assigned to you by SB 272. The complexity required to align all the elements of our communities into a single plan that will adequately respond to the threats of sea level rise is something that is unprecedented. Each element of the One Bay Vision, such as transportation, infrastructure, and housing, has tremendous complexity in itself and requires its own extensive planning processes. The unique threats posed by sea level rise require a crucial addition to this complexity by adding the recognition that the Bay itself and its habitats play a significant role as part of our greater infrastructure, providing innumerable essential economic and environmental benefits and services to our communities, and therefore must be included as both vulnerable assets and vital tools in any sea level rise adaptation planning effort. It is no surprise then, that the public draft of the RSAP is just as complex as these issues. Equally challenging is the fact that with complexity comes the opportunity for confusion from which we believe the RSAP suffers.

The complexity and confusion of the RSAP are understandable. It is essential to provide the context and rationale for the requirements of the SRSAP Guidelines and since they address all of society’s physical elements, its infrastructure and environment, as well as its equity issues, there is a lot of context to be described and, understandably, some need for redundancy. Unfortunately, between the narrative, highlighted boxes, and checklists, it is easy to lose track of the distinctions between aspirations, requirements, and shorthand summaries of requirements. As the RSAP moves through the “Visioning” background it is not clear whether the bullets in the Vision boxes are “requirements” for a SRSAP. For example, on page 50 in the “One Bay Vision” box there is a bullet, “Identify and facilitate opportunities for ecosystems to migrate landward to support and enhance natural adaptation processes.” It is not clear however, whether this bullet is a requirement and not just a

vision. In fact, it is not until under Adaptation Strategies, pages 145 and 150, that it is made clear that a SRSAP should identify locations where marsh migration may occur and if possible, plan for that act.

To provide clarity, in Section 2 of the RSAP, we suggest that for every “One Bay Vision” box, and for every “SRP Adaptation Standard” box either the bullets within that box (One Bay Vision) or the text of the SRP box have accompanying **hyperlinks** that take readers to the Assets, Requirements and Standards pertinent to that bullet or text. There, readers can find elucidation regarding what that Vision or SRP statement requires for inclusion in the SRSAP, i.e. which Assets, Requirements and Standards need to be addressed. That would provide assurance to a reader that those bullets indeed require actions and that there are instructions on how to incorporate those actions into the SRSAP.

Similarly, in Section 3, each Standard in the **Adaptation Standards Matrix Checklist** should have hyperlinks to the full text discussion of what each Standard entails. For example, in the **Matrix Checklist**, Standard #4 is described as “Improve Bayland Habitats and facilitate their long-term survival,” and the **Checklist Submittal Requirements** are, “Improve Baylands habitats and facilitate their long-term survival.”

But the full text of the Standard on pg. 145 goes much further:

Areas along the Bay shoreline with existing Baylands habitats must protect, restore, and/or enhance these habitats to meet regional habitat goals. Protection means continuing the functions and services the habitats provide as sea levels rise over time. Restoring means bringing back functions and services where they once existed ... This can be achieved by ensuring that the spatial extent, distribution, abundance, and conditions of habitat types can be maintained or improved as sea levels rise; **identifying and designating marsh migration space and upland transition zones**; and/or identifying opportunities to connect Baylands habitats ...

The full text brings in the concepts of marsh migration, enhancement and restoration as required objectives if feasible, not issues that urban planners usually think about. It is important that planners can easily find the full text so that they do not ignore some of their obligations under that Standard. Thus, we believe that all checkboxes should have hyperlinks to the text that elucidates the purpose of each checkbox.

For the structure of the RSAP we believe that while it is quite reasonable to have detailed explanations of the various requirements for the Subregional Plan Elements and for all of the other checklists, the narratives do make it difficult to keep track of all these assets, requirements and standards. **We believe it would be very useful to aggregate all of the checklists, standards, assets and requirements in a single appendix or supplement that has no narrative, but is just a list of all of these parts of the SRSAP that are required in the creation of the final submittal. Of course, the hyperlinks will take them to the explanatory texts.**

Finally, we believe that the **Glossary needs to be greatly expanded**. For example, Natural and Nature Based Solutions is a relatively new term and most people have no idea what it refers to and what it means. We provide suggested additions in Attachment A.

2. Why should communities have to worry about the Bay ecosystem and implement NNBS?

Particularly for the Ecosystem Health and Resilience portion of the RSAP, we are dealing with issues and terminology that are new to the planning world, for example Natural and Nature Based Solutions (NNBS). Most planners will not have studied this subject as part of their planning curricula. Many local elected officials have not dealt with this subject, and do not have an understanding of the issues involved or the many co-benefits that the use of NNBS can provide for their communities and the environment. For this reason, RSAP Sections 1 and 2 serve an essential educational function. However, as currently written they are not sufficient to achieve that task. Without proper education on the importance of NNBS, we worry planners will not properly capitalize on the opportunity to implement and expand these assets wherever possible, ultimately undermining the purpose and vision of the RSAP.

While Bay Area residents are clearly dedicated to a healthy Bay, as evidenced by the votes for creating and funding the Restoration Authority, SB 272's requiring local governments to join in the effort to protect, restore and expand Bay habitats through the SRSAPs is a significantly larger step forward. Local governments may ask why there is a need to consider the ecological health of the Bay through the use of NNBS and the RSAP needs to provide the answer, at least briefly but comprehensively. The RSAP needs to explain that protecting and expanding the Bay's habitats not only ensures the continued existence of a healthy Bay, but the continued existence of healthy and thriving Bay Area communities. The RSAP should underscore the fact that our Bay's wetlands and other habitats actually provide significant economic benefits to our communities beyond ecological health.

For example:

- the California Water Quality Monitoring Council states, "Wetland vegetation works as a sediment trap and locks up nutrients and contaminants, thereby preventing concentration downstream that can result in algal blooms or human health hazards ... wetlands act as natural water purifiers, filtering and sequestering sediment and pollutants. Two-thirds or more of all the fish and most of the shellfish we consume are dependent on coastal wetlands..." (https://www.mywaterquality.ca.gov/eco_health/wetlands/extent/types/services.html#:~:text=Wetland%20vegetation%20works%20as%20a,blooms%20or%20human%20health%20hazards.)
- Bay Area Water treatment plants are already being asked to upgrade their processes in order to remove more nutrients to help avoid Harmful Algal Blooms. Expanded Bay wetlands will help reduce that threat and the cost imposed on Bay Area residents to achieve that goal. Expanded wetland acreage will help grow our fishing industry as wetlands act as nurseries for many of our fisheries (fish, crabs, oysters, etc.), producing more jobs.
- Tourism is one of the Bay Area's key industries and a living Bay, with seals, whales and birds, is one of the attractions that sustains this industry . Current data estimates that around 30% of tourists who visit the Bay Area take at least one ferry ride.

- Our Bay's wetlands help moderate the Bay Area's temperature, an essential benefit in a climate change world. The list continues.
- Our Bay's shoreline habitats play a significant role in reducing the impacts of storm surges, acting as barriers that protect communities from flood inundation during high tides. This is why the historically conservative US Army Corps of Engineers is now advocating for the use of **Natural** and Nature Based Features (the equivalent of Solutions), "Natural and Nature Based Features are landscape features that are used to provide engineering functions relevant to flood risk management, while producing additional economic, environmental, and/or social benefits..." (<https://ewn.erdc.dren.mil/natural-nature-based-features/>).
- Tidal marsh vegetation sequesters carbon at a rate ten times greater than tropical forests, thus helping in the fight against climate change and sea level rise itself. All these actions not only protect our communities but also provide immense economic benefits, reducing the need to implement other measures to address these issues.

In other words, the Bay's shallow water habitats play a crucial role in supporting our communities.

We are, again, very appreciative that staff has recognized all of this and have, in the latest draft RSAP, provided some important requirements for the protection and expansion of Bay shoreline habitats and some brief explanations of why this is important. However, we believe that this subject needs significantly greater emphasis. The following edited pages from the RSAP provide several examples of how text can be inserted into the document to provide greater support in explaining the benefits of NNBS.

Many Bay shoreline cities and counties have not planned for and are not prepared for its impacts.⁷ While different communities may face different risks or have different resources to respond, flooding ignores jurisdictional boundaries. As sea levels rise, the Bay shoreline will become more hydrologically connected and neighboring jurisdictions will become increasingly dependent on one another to successfully manage and reduce flood risk.⁸ Local governments and communities must prepare now to avoid catastrophic flooding impacts to their residents—particularly those who are most vulnerable—the natural habitats that provide invaluable benefits and services, including climate change resilience, to people and wildlife, and the built environment and infrastructure that forms the basis of the region’s thriving economy.

Preparing for and actively preventing such damage will be expensive, therefore strategic planning and wise investments in adaptation are essential. A 2023 study found that new flood protection to defend the Bay shoreline in place from sea level rise and storm surge scenario by 2050 would cost at least \$110 billion.⁹ However, there will be a much higher cost if the region fails to prepare for these challenges strategically and prioritize investments based on a strong set of values with a vision of what the Bay Area could become. Every \$1 spent on hazard mitigation saves \$6 in avoided costs of damages.¹⁰ Local governments and communities along the Bay shoreline must seize this opportunity to integrate sound adaptation policies and investments to address local and regional needs for current and future generations.

⁷ Bay Conservation and Development Commission (BCDC), Bay Area Climate Adaptation Network (BayCAN), Metropolitan Transportation Commission - Association of Bay Area Governments (MTC-ABAG), Bay Area Regional Collaborative (BARC), San Francisco Estuary Institute (SFEI), and San Francisco Estuary Partnership (SFEPP), Sea Level Rise Adaptation Progress, Gaps, and Needs Survey

⁸ CHARG, Sea Level Rise (SLR) Flood Connectivity Between Bay Area Jurisdictions (2020), <https://sfbaycharg.org/our-work/jurisdiction-connectivity/>.

⁹ Metropolitan Transportation Commission/Association of Bay Area Governments (MTC/ABAG) and Bay Conservation and Development Commission (BCDC), Sea Level Rise Adaptation Funding and Investment Framework Final Report (July 2023), https://mtc.ca.gov/sites/default/files/documents/2023-07/SLR_Framework_Final_Report.pdf.

¹⁰ Federal Emergency Management Agency (FEMA), Natural Hazard Mitigation Saves Interim Report (June 2018), https://www.fema.gov/sites/default/files/2020-07/fema_mitsaves-factsheet_2018.pdf.

The Regional values, standards, and framework for coordinated adaptation planning, driving the region to achieve equitable, cohesive, and shared benefits that lead the Bay Area into a brighter and more resilient future.

Prioritizing the use of natural and nature-based solutions (NNBS) into adaptation planning

will be crucial in realizing a more resilient future because NNBS provide environmental and societal co-benefits, contrary to conventional grey infrastructure. In addition, *the ecosystem services provided by the Bay’s habitats contribute not only to the resilience of our communities, our economy, but can result in significant monetary contributions over time.* As just a few examples:

- Coastal Wetlands: The National Oceanic Atmospheric Administration (NOAA) estimates that coastal wetlands provide \$23 billion in storm protection services every year^{m1}, and that for the Gulf of Mexico, \$7 are saved for every \$1 spent on wetlands land reef restoration^{m2}.
- Reef Restoration - Studies estimate that between \$10,000 and \$99,000 of ecosystem services per year are provided by 2.5 acres of oyster reef restoration, including shoreline stabilization, benefits to submerged aquatic vegetation (SAV), water quality improvement, etc.^{m3}
- Tourism - A 2015 NOAA report estimated that in 2012, the nine Bay Area counties accounted for nearly \$7 billion GDP in tourism and recreation^{m4}.
- Commercial Fisheries: 2021 data provided by the California Department of Fish and Wildlife (CDFW)^{m5} reported commercial fishing valued at over \$25 million.

FN1 – Cited by NOAA J. Foster, A. Lowe, S. Winkelman, 2011. The Value of Green Infrastructure for Urban Climate Adaptation, Center for Clean Air. Economic Geography 2(1): 31-54.

https://wrrc.arizona.edu/sites/wrrc.arizona.edu/files/green_infrastructure.pdf

FN2 – Cited by NOAA Reguero BG, Beck MW, Bresch DN, Calil J, Meliane I (2018). Comparing the cost effectiveness of nature-based and coastal adaptation: A case study from the Gulf Coast of the United States. PLoS ONE 13(4): e0192132.

<https://doi.org/10.1371/journal.pone.0192132>

FN3 - Jonathan H. Grabowski, Robert D. Brumbaugh, Robert F. Conrad, Andrew G. Keeler, James J. Opaluch, Charles H. Peterson, Michael F. Piehler, Sean P. Powers, Ashley R. Smyth, Economic Valuation of Ecosystem Services Provided by Oyster Reefs, BioScience, Volume 62, Issue 10, October 2012, Pages 900–909, <https://doi.org/10.1525/bio.2012.62.10.10>

FN4 - NOAA. Office for Coastal Management. "Fast facts. Natural Infrastructure." <https://coast.noaa.gov/states/fast-facts/natural-infrastructure.html>

<https://coast.noaa.gov/states/fast-facts/natural-infrastructure.html>

FN5 – NOAA. The National Significance of California’s Ocean Economy. 2015.

<https://coast.noaa.gov/data/digitalcoast/pdf/california-ocean-economy.pdf>

1.4.2 Adaptation Strategies and Benefits Beyond Flood Risk Reduction

Developing adaptation plans and implementing projects that respond to coastal flood hazards is an exercise in balancing risk, costs, feasibility, and the values of communities along and inland of the Bay shoreline. This document provides guidance to decision-makers on how to weigh the most suitable options for adaptation that consider regional and local goals and different existing conditions, vulnerabilities, opportunities, and varying tolerances to risk.

What is Sea Level Rise Adaptation?

In the simplest terms, to adapt means to change in response to environmental conditions. The RSAP focuses on adaptation to sea level rise and related coastal flood hazards to reduce flood risk. Choosing how to change as sea levels rise is often the most challenging—and exciting—aspect of adaptation. For the purpose of the RSAP, an **adaptation “strategy”** refers to a specific action, or set of inter-dependent actions, that achieve a particular outcome. A comprehensive approach to reducing flood risk along a shoreline will likely include multiple strategies that work together, both across a shoreline and function effectively as phased strategies over time as flood risks increase.

Adaptation can include physical adaptation strategies that affect the natural and built landscapes of the shoreline. Physical adaptation strategies can range from natural and nature-based strategies such as constructing ecotone levees, combining marsh restoration with nearshore reefs with eelgrass plantings, or augmenting mudflats, to conventional infrastructure such as elevating land, building seawalls and flood walls, or creating levees or dikes that reduce flood risk²⁹.

Adaptation can occur across a spectrum of conventional to natural and nature-based and can include hybrids of these approaches (Figure 1-7).

The Federal Emergency Management Agency (FEMA) defines natural and nature-based solutions (NNBS) as:

“Sustainable planning, design, environmental management, and engineering practices that weave natural features or processes into the built environment to promote adaptation and resilience. Such solutions enlist natural features and processes in efforts to combat climate change, reduce flood risks, improve water quality, protect coastal property, restore and protect wetlands, stabilize shorelines, reduce urban heat, add recreational space, and more. Nature-based solutions offer significant benefits, monetary and otherwise, often at a lower cost than more traditional infrastructure. These benefits include economic growth, green jobs, increased property values, and improvements to public health, including better disease outcomes and reduced injuries and loss of life.”[FN]

Due to their ability to provide multiple benefits, the use of NNBS should be prioritized to the greatest extent feasible.

Adaptation strategies can also be non-physical and include policy and regulatory actions such as zoning and overlay zones, revising building codes and redevelopment standards, as well as financial strategies such as conservation easements, tax incentives, and climate resilience districts, among others.³⁰

Risk is a function of a hazard (e.g., coastal flood hazards), exposure to those hazards (which is increasing as sea levels rise), and the vulnerability of assets exposure (e.g., sensitivity, adaptive capacity, and consequence) (Figure 1—6). Different strategic adaptation approaches work to reduce flood risk in different ways. The goal of adaptation is to reduce the risk of flooding for assets and areas that are locally and regionally important along a shoreline. An **asset** refers to anything of value, which can include people, property, natural habitats, development, activities, or other aspects of society important to a community.

29 J. Beagle, J. Lowe, K. McKnight, S. M. Safran, L. Tam, and S. Jo Szambelan, San Francisco Bay Shoreline Adaptation Atlas: Working with Nature to Plan for Sea Level Rise Using Operational Landscape Units, SFEI Contribution No. 915 (Richmond, CA: SFEI & SPUR, 2019), 255.

30 Beagle et al., San Francisco Bay Shoreline Adaptation Atlas, 255.

FEMA, “Building Community Resilience with Nature-Based Solutions. A Guide for Local Communities. June 2021. https://www.fema.gov/sites/default/files/documents/fema_riskmap-nature-based-solutions-guide_2021.pdf

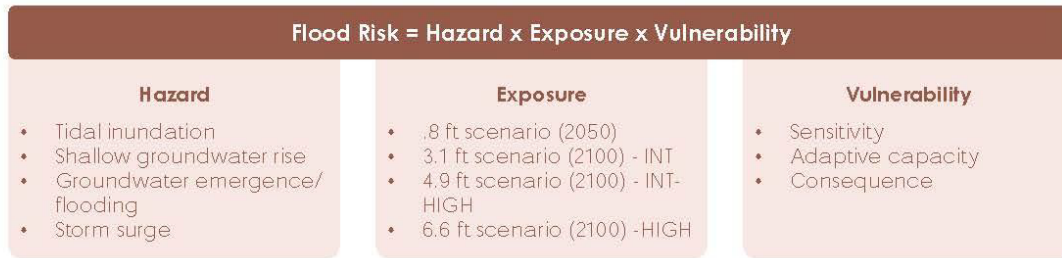


Figure 1—6. A description of flood risk for the RSAP. This includes the minimum coastal flood hazards, exposure due to minimum sea level rise scenarios, and components of vulnerability. For more information on types of flood hazards, see the Science of Sea Level Rise and Coastal Hazards (Section 1.4.1).

ADAPTATION PATHWAYS

A promising approach to the challenge of making adaptation decisions today that supports flexibility for future adaptation options is known as adaptation pathways. This means developing adaptation strategies comprised of discrete, manageable steps that can be sequenced and adjusted as sea levels rise and risk changes over time.³¹ Pathways rely on developing triggers and decision-points based upon monitoring the effectiveness of strategies and evaluating the changing physical and social conditions that signal when changes to the pathways need to occur.

TOWARDS GREENER ADAPTATION

Using natural and nature-based adaptation to reduce coastal flood risk while also improving Baylands habitats is an emerging field in adaptation. However, there are differences in planning, feasibility, goals, methods, costing and other considerations for the spectrum of nature-based to hard infrastructure adaptation. Engineering standards and permitting criteria will need to be refined over time to ensure that nature-based and hybrid adaptation approaches can be widely used.

While increasing efforts will be needed to champion, test, learn from, and employ effective nature-based approaches region-wide and advance the concept that adaptation can include both promoting nature and providing benefits to shoreline communities, the efficacy and value of NNBS has already been demonstrated in other areas of the United States and internationally.

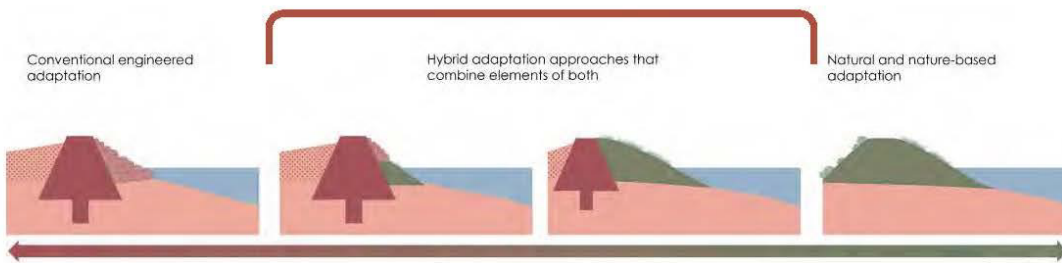


Figure 1—7. Spectrum of natural and nature-based adaptation and conventional adaptation

31 Saskia E. Werners, Russell M. Wise, James R.A. Butler, Edmond Totin, and Katharine Vincent, "Adaptation Pathways: A Review of Approaches and a Learning Framework," Environmental Science & Policy 116 (2021): 266–275.

As sea levels rise, recreation and access points may be inundated — temporarily now, but permanently in the future — reducing access to the Bay shoreline. Even adaptation solutions themselves may reduce access and enjoyment of the Bay shoreline. Levees or seawalls that block views and access protect assets from getting wet but impact the quality of the shoreline. Decisions about what, where, and how to implement shoreline adaptation need to consider how to maintain and enhance shoreline access and opportunities for shoreline recreation and how access and recreation may need to change and adapt as seas rise further.

The shoreline is also home to Baylands habitats, which are more than just beautiful to look at. These natural systems provide habitat for wildlife, endangered species, and layover stops for North America’s migratory birds. They provide enormous economic benefits to the region through their **ecosystem services**, including sustaining the 70 percent of California’s commercial fisheries that are dependent on wetlands habitat, making San Francisco Bay habitats a major economic contributor to the State.³³ They also support essential services of recycling nutrients, improving water quality, and storing and sequestering carbon that draws GHGs out of the atmosphere. Complete Baylands habitats includes subtidal habitats, to intertidal areas including tidal wetlands (also called marshes), and upland habitat areas.

But these habitats are threatened by sea level rise. As coastal flood hazards increase, habitat types will be forced to shift – tidal wetlands will have to move to upland transition zones, and open Bay water will drown existing tidal wetlands – and critical services will change or be lost. Coastal habitats can naturally adapt to rising sea levels if they

Ecosystem Services

Ecosystem services are the direct and indirect benefits ecosystems provide humans and that support and sustain human livelihoods. [fn]

Provisioning	Regulating
<ul style="list-style-type: none"> * Nursery for fish species * Habitat for aquatic invertebrates * Food (waterfowl, fish, crabs, oysters, algae, etc.) 	<ul style="list-style-type: none"> * Wave attenuation * Flood attenuation * Climate regulation * Nutrient cycling * Water quality (Purification/pollution control/disease regulation)
Supporting	Cultural
<ul style="list-style-type: none"> * Carbon storage and sequestration * High biodiversity and productivity * Habitat for wildlife (feeding & breeding grounds) * Migratory birds 	<ul style="list-style-type: none"> * Tourism * Recreation * Education * Aesthetics * Cultural value * Human health and well-being * Sense of place

Millennium Ecosystem Assessment 2005.^{fn}

have access to sustainable sources of sediment that allow them to build up their elevation and have access to upland areas to migrate, known as wetlands migration space. In the Bay Area, some parts of the shoreline have wetlands migration space and upland transition zone available that may allow natural adaptation to happen. But in other areas, existing development limits the ability for landward migration, and at the same time the region’s decreasing available sediment can further limit the Baylands natural ability to adapt.³⁴

Improving Baylands not only supports habitats and ecosystem services, but it can also reduce coastal flood risk and impacts. Baylands can reduce wave

33 Felicia Madsen, Athena Honore, and Stephen Knight, "Greening the Bay Area: Recommendations for Improving the Environmental Sustainability of Bay Area Transportation and Land Use," Save the Bay, April 22, 2009. https://www.sfbayrestore.org/sites/default/files/2019-07/2009-04-22-gb-item_2_greening_the_bay.pdf.

34 Beagle et al., San Francisco Bay Shoreline Adaptation Atlas, 61-183.

USDA Climate Hubs. U.S. Department of Agriculture. "Ecosystem Service" <https://www.climatehubs.usda.gov/ecosystem-services> Accessed September 2024

Millennium Ecosystem Assessment, 2005. ECOSYSTEMS AND HUMAN WELL-BEING: WETLANDS AND WATER Synthesis. World Resources Institute, Washington, DC. Copyright © 2005 World Resources Institute

3) Need for stronger universal emphasis on use of NNBS

We are very appreciative that NNBS does appear in nearly all of the SRP Topic Area discussions, if only as a single phrase. However, more than how often the term is used, where the term is situated can be even more important. For example, Topic Area 2.3.8, “Collaborative Governance...” includes a quote from the One Bay Vision that includes NBS, “...Ensure local and regional governments **collaborate among themselves and with others to address shared flooding risk, identify multi-benefit adaptation opportunities including nature-based solutions....**” However, the SRP Box stating requirements for that Topic Area does not mention NBS, and when one arrives at the Adaptation Strategy Standards text as the requirement for that issue (#6, pg. 146), NBS does not appear. While we recognize that NBS is mentioned elsewhere, if one is only looking at how to proceed with collaborative efforts to avoid flooding, it would be quite possible to think that for this issue NBS need not be considered. While it might have been mentioned in the Vision Statement, the failure to appear in the Specific SRP means it may not be read as an Adaptation Strategy Standard that must be considered.

As well, while NNBS is discussed primarily in terms of the living shoreline being an asset, it is not really discussed in terms of being a tool or method to be used to protect other assets. As mentioned earlier, city planners are not well versed in using these tools, and don’t necessarily understand how they can be deployed or even that it is possible that their use can be cost efficient in the long run. It is important to stress the possibilities of NNBS throughout the various sections, especially when talking about planning adaptation or in the various checklists.

4) Strengthen Discussion and Requirements regarding Contaminants and Groundwater Rise

The related issues of contaminants and groundwater rise, while addressed in the RSAP, are also not given the attention they demand. The RSAP’s contamination Standard is too narrow, both in terms of impact and applicability. Specifically, the RSAP Standard to reduce contamination risks in Environmental Justice communities (Adaptation Strategy Standard 11) seems only to address contaminant issues “due to flooding,” omitting the substantial new contamination risks posed by subsurface movement of shallow groundwater. Additionally, there appears to be no contamination Standard at all pertaining to non-EJ communities. Our organizations greatly appreciate and support the RSAP process in its attempt to address Environmental Justice and equity issues in nearly every Element, Requirement and Standard. However, contamination risks associated with sea level rise are not restricted to these communities, so we ask that this Standard be expanded to require all communities to develop strategies for contamination cleanup and risk reduction related to both flooding and subsurface shallow groundwater movement.

In addition to expanding the RSAP’s approach to contamination Standards, Section 2.3.7, (Shoreline Contamination) should require, not merely recommend, assessment of brownfield sites, buildings and/or land use that contain hazardous materials, and oil spill risks, especially in EJ communities, expand Adaptation Strategy Standard 16 (Incorporate climate-responsive standards and codes for adaptive design) to specifically include contamination risks, and raise the SLR exposure threshold to be assessed from the 2050 scenario to the 2100 scenario of 6.6 feet.

Groundwater rise poses unique challenges whether emergent or non-emergent and shallow. Besides the risks to underground or aging infrastructure it may also increase the risk of mobilizing contaminants from many hundreds, if not thousands, of toxic sites and landfills surrounding the Bay with negative impacts on public health and Bay water quality and ecosystems.

[\(https://news.berkeley.edu/2023/06/20/rising-groundwater-threatens-thousands-of-toxic-sites-in-the-bay-area/\)](https://news.berkeley.edu/2023/06/20/rising-groundwater-threatens-thousands-of-toxic-sites-in-the-bay-area/)

The vast majority of toxic sites and landfills have contamination either left in place or are open pits filled with contaminated materials. A “cap” may be placed over the top to prevent spread of contamination, but most often the sides and bottoms of capped sites are not sealed in any way. In some cases, the bottom of the site may rest directly on Bay mud. The presence of a cap may protect the top of the site, but with sea level rise, the threat comes from underneath, by “non-emergent shallow groundwater” that is pushed upwards as sea levels rise. As this water encounters the contaminants in capped sites, toxins are mobilized and can be washed out into the Bay or follow the path of least resistance, creating plumes of contaminated groundwater that carry the toxins beneath nearby neighborhoods.

While the RSAP does emphasize the importance of this issue for vulnerable communities, the issue of groundwater and contamination, **wherever it occurs**, is a potential threat to public health, Bay ecology and the ecosystems that we all depend upon. Therefore, the RSAP needs to require that all communities address this issue. While BCDC and local communities usually are not as responsible for these capped sites as the Department of Toxic Substance Control (DTSC), we urge BCDC to develop stronger language in the RSAP urging DTSC to collaborate with local governments in all SRSAP planning efforts and to propose solutions to the more intractable sites where contaminants cannot be removed and there are no liners for the pits.

Finally, although potentially outside of the scope of BCDC’s SB272 directive, we strongly urge BCDC to take a leadership role in facilitating more responsive action by regulatory agencies to address the contamination concerns of EJ communities, and promoting a legislative and/or regulatory scheme to generate shared, region-wide commitments, coordination and investment to advance contamination cleanup in EJ communities.

5. Metrics

While having specific numeric goals may not be appropriate for all SRSAP Elements, it certainly is essential for Ecosystem Health and Resilience. “Regional Goals” are mentioned with some frequency in those sections that deal with this issue as goals that local governments need to assist in reaching if that is feasible as part of the SRSAP. However, nothing in the RSAP language defines the goals. Instead, we have only language that says we should “protect and restore” Bay habitats, with no indication of how much is enough - 1,000 acres? 10,000 acres? 100,000 acres? This type of information is not only essential for the development of Shoreline Adaptation Plans, but also for the evaluation of those plans once submitted, and for assessing whether as a region, the RSAP is helping us achieve regional goals. Without stating what those goals are, how will it be possible to measure the success of the RSAP process at the five- and ten-year review periods? Without being mindful of those goals when developing Shoreline Adaptation Plans, how do we course correct? Given the

pressure for continued development of the shoreline, how will we learn from project tracking and mapping that we are not meeting those goals if those goals are not stated? These regionally accepted goals do indeed exist. For example, the habitat goals in the Bay Ecosystem Habitat Goals Report as well as the Sub-Tidal Goals study and the 2022 Implementation Strategy of the San Francisco Bay Joint Venture. Their goals should be incorporated into the RSAP.

This can be achieved by including in Section 2.3.2 Ecosystem Health and Resilience the habitat acreage targets for the region, for example a goal of 100,000 acres for tidal marsh, a figure that was first established by the 1999 Baylands Ecosystem Habitat Goals. Additionally, this section should reference the goals of protection 16,500 acres of estuarine-upland transition zone habitat and 14,000 acres of suitable adjacent uplands habitat, as these areas are most threatened by continued development of the shoreline.

Additionally, we propose a definition of “Regional Habitat Goals” be added to the Glossary (Attachment A):

“Regional Habitat Goals” reflect the target of restoring 100,000 acres of tidal wetlands as identified in the 1999 Baylands Ecosystem Habitat Goals, and the targets of protecting 16,500 acres of estuarine-uplands transition zone habitat and 14,000 acres of suitable adjacent undeveloped or lightly developed uplands habitat, as identified in the 2022 San Francisco Bay Joint Venture Implementation Strategy.

The need for this is made clear in the map provided for Element 2, Ecosystem Health, in which the areas depicted on the map are vague. Local governments will have great difficulty determining which habitats are within their jurisdiction and the extent of their existing and potential acreage. More detailed maps are available. This is particularly important for shoreline areas that have Upland Transition Zones and for those that may provide for wetland migration. While we recognize that the capacity of each jurisdiction to contribute to the habitat goals will vary dramatically, every SRSAP should indicate how much acreage it anticipates it will protect, restore, and enhance. Where deemed infeasible, the SRSAP should explain why.

Also, the need for monitoring all SRSAP’s Projects that are implemented must be emphasized. Otherwise, it will be impossible to determine whether those actions achieve intended goals. We believe that Element F3 could be relabeled “Include an Adaptive Management Program” that would describe the process for monitoring and also for decision-making once monitoring results are presented that may show the need for some realignment of adaptation measures. Element F. should be expanded to include an F.3.c. that requires the plan to identify what entity is responsible for determining and implementing next steps once monitoring data is collected and analyzed and if analysis indicates a need for further actions.

We recommend that page 50, 2.3.2 Ecosystem Health and Resilience be revised as follows:

Suggested revised page 50

2.3.2 Ecosystem Health and Resilience

Ecosystem Health and Resilience includes supporting an overall healthy Bay and Baylands ecosystems. The Baylands ecosystem includes the Baylands, which consist of the shallow water habitats around the San Francisco Bay between the minimum and maximum tidal elevations, subtidal habitats, and transition zones and adjacent uplands and their associated plants, animals, and other organisms.² These habitats provide essential ecosystem services that support environmental, social, and economic well-being. Coastal flooding has the potential to alter Baylands ecosystems and drown certain habitats in the absence of effective adaptation responses, while using nature and nature-based adaptation can support flood risk reduction and provide ecosystem benefits.

² San Francisco Estuary Partnership. *Habitat Goals: A Framework for a Sustainable Bay-Delta Ecosystem* (San Francisco Estuary Partnership, December 2012).

AS SEA LEVELS RISE...

Healthy Baylands ecosystems

thrive. To achieve this:

- **Protect, restore, and enhance** Baylands ecosystems to improve their function, scale, biodiversity, and services.
- **Prioritize nature-based solutions where possible** and incorporate habitat connectivity, sediment management, and whole watershed approaches into shoreline planning and projects.
- Identify and facilitate **opportunities for ecosystems to migrate landward** to support and enhance natural adaptation processes.
- **Advance Regional Habitat Goals** of restoring 100,000 acres of tidal wetlands, 16,500 acres of transition zone habitat, and 14,000 acres of suitable adjacent upland habitat.^{3,4}

ONE BAY VISION

³ Monroe, M.; Olofson, P. R.; Collins, J. N.; Grossinger, R. M.; Halfiner, J.; Wilcox, C. 1999. Baylands Ecosystem Habitat Goals. SFEI Contribution No. 330. U. S. Environmental Protection Agency, San Francisco, Calif./S.F. Bay Regional Water Quality Control Board, Oakland, Calif. p 328.

⁴ San Francisco Bay Joint Venture. 2022. Restoring the Estuary - A Framework for the Restoration of Wetlands and Wildlife in the San Francisco Bay Area. Richmond, CA.

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Further discussion of this issue has been provided in the comments submitted by Coordinator Kelli McCune for the San Francisco Bay Joint Venture. We strongly endorse the suggestions presented in

that submission, including the need to identify the SFEI EcoAtlas as the “Regional Project Database” described in Element G.1.b.

6. Should and Must

We greatly appreciate your elucidation of the uses of “Must, Required and Should” (RSAP, pg. 6):

The terms “**must**” and “**required**” are used to denote content that is mandatory to be completed in Subregional Shoreline Adaptation Plans. “**Should**” means local governments make every attempt possible to meet the information listed. If that information cannot be provided or met, a description of why must be included. All plan requirements and standards are mandatory.

SB 272 was enacted to ensure that the Bay Area (and the coast) addressed sea level rise in a coordinated, collaborative manner that acts to protect all our communities, preserve the Bay’s health and provide vulnerable, under-resourced communities the opportunity to meet all these goals. The Act was needed because otherwise, individual communities would seek their own best interests and not consider all the rest of the Bay’s communities and habitats.

Unless there are clear mandatory requirements, local communities could use the discretion provided by the word “should” to ignore many of the instructions in the RSAP that are designed to, again, result in resilient communities and a healthy Bay.

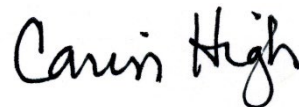
In so complex a program there will always be conflicts between desired end results. There is no question that compromises will be necessary. Communities will be protected with gray infrastructure where no other alternatives exist. Wetland migration will, hopefully, take place in agreed upon locations. But, even with gray infrastructure, NNBS features can be utilized to provide some support for the Bay ecosystem satisfying the “must” elements of “Ecosystem Health and Resilience.” We urge that the RSAP retains the distinctions of “must” and “required.”

Thanks again for the opportunity to provide comments, and for creating such a substantial document and program that will hopefully advance a coordinated, region-wide, holistic and resilient approach to the significant challenges posed by sea level rise, and that will ensure healthy shoreline communities and a functioning Bay ecosystem. We request that we be kept informed of future opportunities to participate in the RSAP process as it transitions from the drafting of the RSAP, to implementation and review of submitted Shoreline Adaptation Plans.

Respectfully submitted,



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ATTACHMENT A

APPENDIX B - GLOSSARY

Most definitions come from the RSAP, others are highlighted in Yellow (some with other authors) and some editorial issues also highlighted

Adaptation (based on page 28 of the RSAP draft)

“To adapt means to change in response to environmental conditions,” such as sea level rise. “For the purpose of the RSAP, an adaptation “strategy” refers to a specific action, or set of interdependent actions that ”are designed to “achieve a particular outcome.” Adaptation strategies can range from natural and nature-based solutions (NNBS), such as “combining marsh restoration with eelgrass plantings or augmenting mudflats.” Physical adaptation strategies can involve “gray infrastructure” such as “building sea walls or flood walls, or creating levees or dikes.” **The RSAP requires consideration of NNBS for all proposed adaptation strategies.**

Adaptation pathways (definition from page 36 of the RSAP draft)

Adaptation pathways mean developing adaptation strategies consisting of discrete, manageable steps that can be sequenced and adjusted as sea levels rise and risk changes over time. Pathways rely on developing triggers and decision-points and monitoring the effectiveness of strategies and changing physical and social conditions that signal when changes to the pathways need to occur.

Adaptive capacity (draft definition is fine.)

The ability to adjust to potential damage, to take advantage of opportunities, or to respond to consequences.

Baylands (from p. 50 of RSAP draft)

The Baylands “consist of the shallow water habitats around the San Francisco Bay between the minimum and maximum tidal elevations, subtidal habitats, and transition zones and adjacent uplands and their associated plants, animals, and other organisms. These habitats provide essential ecosystem services that support environmental, social, and economic well-being. Coastal flooding has the potential to alter Baylands ecosystems and drown certain habitats in the absence of effective adaptation responses, while using nature and nature-based adaptation can support flood risk reduction and provide ecosystem benefits.”

Beneficial sediment reuse (With one exception, draft definition is fine.)

“The removal of a large volume of sediment from a channel that is reused locally and is financially viable for both the agency completing the removal and the project that is using the sediment. The combination of increasing Bayland sediment demand and altered watershed sediment supply has necessitated creative and non-traditional methods and solutions be developed and utilized to provide sediment to locations where it is needed.” (Addition) **Sediments must always be tested for contamination before being considered for relocation.**

NOTE: Some Bay Area sediments are massively contaminated, such as those near the United Heckathorn Superfund site, which is contaminated by DDT and its derivatives, as well as dieldrin (an insecticide that is toxic to humans). If transported to new locations, such sediments could have impacts on local ecosystems, as well as on public health.

Brownfield Sites (not defined in RSAP draft; EPA definition below)

Brownfield sites are real properties, the expansion, development, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. A brownfield differs from a superfund site in that it is less severely contaminated, and thus less likely to be cleaned up with federal funds.

Climate adaptation planning (Draft definition is fine.)

“The process by which communities assess potential future risks, including those specific to their context, and develop strategies to prepare for and mitigate these risks before they occur.”

Community (definitions from page 36 of the RSAP draft)

“Community is used broadly to refer to any populations in the region that make up constituencies of cities and counties. This can include vulnerable communities as described below, as well as people of all backgrounds and income levels.

- **Socially vulnerable communities**

Socially vulnerable communities refers to block groups that rank from Moderate to Highest Social Vulnerability according to BCDC’s Community Vulnerability Map.

- **Environmental Justice communities**

Environmental Justice communities refers to communities that lie within the 60th percentile of environmental burden according to CalEnviroScreen 4.0.

- **Disadvantaged communities**

Disadvantaged communities refers to communities that fall below 80% of the statewide Median Household Income (MHI).

- **Frontline communities** (definition from Mohnot et al. (2019). Greenlining Institute Guidebook.

Frontline communities “include lower-income communities, communities of color, Indigenous peoples and Tribal nations, and immigrant communities who are especially vulnerable to the impacts of climate change because of decades-long, pervasive socioeconomic conditions that are perpetuated by systems of inequitable power and resource distribution.”

Consequence (Draft definition is fine.)

“The result or effect of the climate change impacts on society, equity, the economy, and the built and natural environment. Consequences can be quantitative or qualitative.”

Contamination and Contaminated Sites (rewritten EPA definition)

When soils and sediments have been contaminated by environmental releases of chemicals and toxins, the Federal Environmental Protection Agency and relevant California state agencies

are responsible for providing solutions and restoring sites so that ecosystems and public health are protected from harmful exposures.

Decision-points (Draft definition is fine.)

“Manageable steps that when put into sequence make up strategy approaches for making decisions under deep uncertainty. This process supports the ability to take shorter-term actions with longer-term alternative futures in mind.”

Ecosystem (Australian Museum)

An ecosystem includes all the living things (plants, animals and organisms) in a given area, interacting with each other, and with their non-living environments (weather, earth, sun, soil, climate, atmosphere). In an ecosystem, each organism has its own niche or role to play.

Ecosystem Health and Resilience Characteristics (Note: name change from Habitat Resilience Characteristics) (definition taken from p. 91 of draft RSAP)

“The existing ecological and biological conditions in the nearshore, shoreline, and uplands area” must be listed in the Bay Ecosystem Health and Resilience Minimum Categories and Assets. This includes spatial extents of subtidal habitats (including eelgrass), intertidal flats, tidal marshes, diked Baylands, beaches, rocky intertidal, estuarine-terrestrial transition zones, adjacent uplands, and creeks and channels connected to the Bay in the planning area.”

Ecosystem Services (definition from page 33 of the RSAP draft)

“These natural systems provide habitat for wildlife, endangered species, and layover stops for North America’s migratory birds. They provide enormous economic benefits to the region through their ecosystem services, including sustaining the 70 percent of California’s commercial fisheries that are dependent on wetlands habitat, making San Francisco Bay habitats a major economic contributor to the State. They also support essential services of recycling nutrients, improving water quality, and storing and sequestering carbon that draws GHGs out of the atmosphere.”

Environmental Justice Communities (see Communities)

Equitable participation (Draft definition is fine.)

“Explicitly including individuals from populations who have been historically excluded from planning efforts.”

Equity (Draft definition is fine.)

“Centering people in inclusive decision-making, which means fairness and access for all to participate in the processes, removing barriers to participation between certain groups, ensuring voices and perspectives are heard and integrated in meaningful ways, and a commitment to transparency, sustained engagement, and measurement of actions that improve outcomes for all.”

Exposure (Draft definition is fine.)

“The people, property, systems, or functions that could be lost to a hazard. Generally, exposure includes what lies in the area the hazard could affect.”

Extreme High Tides (Draft definition is fine. However, the discussion in the RSAP draft text on p. 26 is in error. There will be no increase in frequency of King Tides, though of course the levels of tides will increase with sea level rise.)

“Also known as king tides, these tides are astronomical in origin. They occur when the Moon is at its closest distance to Earth (perigee) during a new or full moon, with the Earth, Moon, and Sun aligned. The combined gravitational forces of the Moon and Sun lead to higher-than-usual tide levels.”

Flooding (All of these forms of flooding are being defined in the Glossary under the heading of Flooding. The text of the RSAP draft should specify the form(s) of flooding that is (are) being discussed.)

- **“Sea level rise**
Global sea level rise due to climate change is already affecting the Bay Area. Ice sheets and glaciers are melting, and sea water is warmer, causing it to expand.
- **Storm surge** (See Storm Surge.)
- **Stormwater**
Many cities have underground storm drain systems to prevent damage by carrying rain water away (into the ocean, for example). During heavy rains or high tides, rising sea levels may back up such systems, resulting in flooding.
- **Surface flooding**
Water can appear on the surface after heavy rains, or when shallow groundwater rise emerges at the surface, or when storm surge results in sea water being pushed inland, or when sea level rise becomes sufficiently high to slosh over protective barriers.
- **Tsunami**
Tsunamis result from volcanic activity. Huge waves are propagated and can move rapidly across oceans to cause extensive damage and flooding on coastlines.”

Greenhouse gas emissions (Draft definition is fine.)

“Gasses that trap heat in Earth's atmosphere, crucial for regulating the planet's surface temperature. Human activities, including electricity generation, vehicle use, and farming and forestry practices, have increased the concentration of these gasses beyond natural levels. This enhanced greenhouse effect contributes significantly to global climate change.”[spelling]

Groundwater rise (Definition taken from Shallow Groundwater Response to Sea-Level Rise. Alameda, Marin, San Francisco, and San Mateo Counties)

In nearshore coastal areas, the shallow groundwater table will rise as sea levels rise. This slow but chronic threat can flood communities from below, damaging buried infrastructure and roadway subgrades, increasing infiltration into sewer systems, flooding below grade structures,

mobilizing contaminants, and emerging aboveground as an urban flood hazard, even before coastal flood waters overtop the shoreline due to sea level rise.

Habitat Resilience Characteristics (See Ecosystem Health and Resilience Characteristics)

Habitat Connectivity (California Department of Fish and Wildlife)

Connectivity refers to the degree that organisms or natural processes can move unimpeded across habitats - both terrestrial and aquatic. Natural and semi-natural components of the landscape must be large enough and connected enough to meet the needs of all species that use them.

Hazard (Draft definition is fine.)

“Events or conditions that could injure people or damage assets.”

Hydrologic connectivity

Hydrologic connectivity is an important characteristic controlling ecosystem services, since movement of chemical constituents and biological organisms are often associated with water flow. The degree to which wetlands are connected to other ecosystems can be a controlling influence on the larger landscape. Wetlands with high connectivity can serve as sources, while those with low connectivity can serve as sinks. It is important to analyze hydrologic characteristics when considering NNBS approaches.

Leibowitz et al. (2018). Wetland hydrological connectivity: A classification approach and United States assessment. 2017 AWRA Spring Specialty Conference on Aquatic System Connectivity, Snowbird, UT, May 1-3.

Intergenerational equity (Draft definition is fine.)

“Planning guided by generational thinking. This concept considers how the decisions of past and present generations will impact future generations and what may be owed to them or mended based on these decisions. Environmentally, this form of justice focuses on a sense of moral repair and generational obligation.”

Natural and nature-based solutions (NNBS) (from page 28)

“Natural and nature-based solutions are actions to protect, conserve, restore, as well as use and manage ecosystems in sustainable ways that address social, economic and environmental challenges while simultaneously benefiting human well-being and biodiversity. In other words, they are interventions that use nature and the natural functions of healthy ecosystems to tackle some of the most pressing challenges of our time (e.g. sea level rise, groundwater rise, etc.). Due to their ability to provide multiple benefits, the use of NNBS should be prioritized to the greatest extent feasible.”

Non-physical adaptation (Draft definition is fine.)

“Measures that involve changing policies and regulations (such as new building codes or zoning requirements like setbacks and buffer zones), updating design guidelines, or enhancing education and community outreach to raise awareness and bolster community resilience.”

One Bay Vision (Draft definition is fine.)

“An essential component of BCDC’s Regional Shoreline Adaptation Plan (RSAP). It describes what adaptation to sea level rise should look like for our communities, and outlines actions we can take across our region to achieve successful adaptation.”

Operational Landscape Units (OLU)

Operational landscape units (OLUs) are defined as combinations of landscape patches with their hydrogeological and biotic connections, as a tool to facilitate wetland restoration in catchments with a high degree of fragmentation and strongly altered hydrology.

Verhoeven et al. (2008). An Operational Landscape Unit approach for identifying key landscape connections in wetland restoration. *J. Applied Ecology* 45: 1496-1503.

Physical adaptation (Draft definition is fine.)

“Measures such as constructing levees, flood walls, and wetlands or relocating an asset, that mitigate the flooding impacts of sea level rise”.

Public trust (Draft definition is fine.)

“A legal principle at the core of BCDC’s mission. Under the public trust doctrine, “sovereign lands,” such as tidelands and the Bay itself, are held in trust by the State of California for the benefit, use and enjoyment of the public. The McAteer-Petris Act and the Bay Plan are an exercise of authority by the Legislature over public trust lands. When BCDC takes any action affecting lands subject to the public trust, it considers whether its actions are consistent with the public trust needs for the area.”

Regional Habitat Goals

Regional Habitat Goals reflect the target of restoring 100,000 acres of tidal wetlands as identified in the 1999 Baylands Ecosystem Habitat Goals, as well as the targets of protecting 16,500 acres of estuarine-uplands transition zone habitat and 14,000 acres of suitable adjacent undeveloped or lightly developed uplands habitat, as identified in the 2022 San Francisco Bay Joint Venture Implementation Strategy.

Resilience (Draft definition is fine.)

“The capacity of any entity — an individual, a community, an organization, or a natural system — to prepare for disruptions, to recover from shocks and stresses, and to adapt and grow from a disruptive experience.”

Risk (Note: This definition is being rewritten to include risk to ecosystems, to wildlife, to geomorphic characteristics, to cultural resources, (and more) as well as to the factors listed. FEMA may primarily be interested in impacts on people and structures (etc.) in a ‘community,’

but the stakes in sea level rise are much broader. For example, the risks of ecosystem disruption by sea level rise may affect the entire California coastline.)

The estimated impact that a hazard would have on ecosystems, on specific or a broad range of species, on geology, on cultural resources such as Native American shellmounds, as well as on people, services, facilities, and structures.

San Francisco Bay Conservation and Development Commission (Draft definition is fine.)

“A California state planning and regulatory agency with regional authority over the San Francisco Bay, the Bay’s shoreline band, and the Suisun Marsh. Its mission is to protect and enhance San Francisco Bay and to encourage the Bay’s responsible and productive use for this and future generations. State law requires sponsors of projects that propose to fill or extract materials from the Bay to apply for a BCDC permit. In addition to minimizing any fill required for an appropriate project and ensuring that the project is compatible with the conservation of Bay resources, BCDC is tasked with requiring maximum feasible public access within the Bay’s 100-foot shoreline band.”

Sea level rise (Draft definition is fine.)

“The worldwide average increase in ocean water levels due to human caused climate change, where warmer atmospheric and ocean temperatures cause ocean waters to expand and glaciers and ice sheets to melt.”

Sensitivity (Draft definition is fine.)

“The degree to which a species, natural system, or community, government, and other associated systems would be affected by changing climate conditions.”

Shoreline Ecosystems

For the purposes of the RSAP, shoreline ecosystems are ecosystems located in the subtidal zone (below the intertidal zone), the intertidal zone (between high and low tides), and the actual coastline above the high tide line, including beaches and banks. All organisms in these zones (including those that are microscopic) interact with each other and with the physical environment to play a role in the interactive and dynamic shoreline ecosystems. Moving from the subtidal zone to dry land, there can be several transitional ecosystems.

Socially vulnerable communities (see Communities)

Storm surge (Draft definition is fine.)

“An abnormal rise of water generated by high winds and low atmospheric pressure in the presence of a storm that is over and above the predicted astronomical tide. Often these storms are explained in terms of the probability that they will occur in a given year. For example:

5-year storm surge has a 1-in-5 chance (20% chance) of occurring any given year

50-year storm surge has a 1-in-50 chance (2% chance) of occurring any given year

- **Subregional** (Draft definition is fine.)

- A smaller, more localized area within a larger region that is considered for detailed planning and management. This term is used to refer to any areas smaller than the nine-county San Francisco Bay region to address local conditions, vulnerabilities, and adaptation strategies.

Subregional Shoreline Adaptation Plan (Draft definition is fine.)

- . Plans created by cities and counties, supported by BCDC, that are consistent with the RSAP guidelines to ensure that the region is prepared for sea level rise both locally and in alignment with the region.”

Suisun Marsh Preservation Act (Draft definition is fine.)

- . “The Act gives BCDC permitting and enforcement responsibilities for the Marsh. BCDC shares these responsibilities with other agencies and local governments.”

Superfund and Superfund-qualified Sites (EPA definition)

- . Superfund sites are uncontrolled or abandoned sites or properties where hazardous waste or other contamination is located. A contaminated site is generally considered a "Superfund site" if the federal government is or plans to be involved in cleanup efforts.

Triggers (Draft definition is fine.)

- . “The set of conditions that signals the time for a new strategy. A trigger is based on factors specific to the effect it addresses. It can be any number of signals (e.g. such as a specified level of service disruption such as transit service availability).”

Vulnerability

(Note: The definition of vulnerability in the draft is limited to human life and property. The definition must be expanded.)

The exposure of humans and their health and property, as well as the exposure of ecosystems to damage. Ecological vulnerability refers to the degree of ecosystem disturbance, system damage, and the ability of system restoration.

Hou et al., (2022). A new perspective on ecological vulnerability and its transformation mechanisms. *Ecosystem Health and Sustainability* 8:2115403.

Vulnerability Assessment (Element C) (based on page 88 of RSAP)

Understanding the physical and ecological conditions of the shoreline provides an essential baseline to evaluate vulnerabilities to coastal flood hazards. The kinds of flood hazards must be specified. This information will then aid in the identification of adaptation strategies informed by local considerations and opportunities, such as where nature-based adaptation may be suitable, the trajectory of current and future development patterns, or other locally relevant information that can inform the selection and evaluation of adaptation alternatives.

Water dependent uses (Draft definition is fine, except for the error below.)

- . Uses and facilities which require direct access to, or location in, marine or tidal waters and which therefore cannot be located inland, including but not limited to: Marinas, recreational and commercial fishing and boating facilities, finfish and shellfish processing plants, waterfront dock and port facilities, shipyards and boat building facilities, water- based recreational uses, navigation aides (should be “aids”), basins and channels, industrial uses dependent upon

water- borne transportation or requiring large volumes of cooling or process water which cannot reasonably be located or operated at an inland site and uses which provide general public access to marine or tidal waters.

Wildlife (Wikipedia)

Wildlife can be found in all ecological systems. Wildlife refers to undomesticated animal species, but has come to include all organisms that grow or live wild in an area without having been introduced by humans. Wildlife was also synonymous to game: those birds and mammals that are hunted for sport or subsistence.

	October 18, 2023	ATTACHMENT B TO SIERRA CLUB BAY ALIVE LETTER DATED OCTOBER 18, 2023 ADDITIONAL COMMENTS ON THE RSAP GUIDELINES
		This spreadsheet contains comments on specific pages of the RSAP, or suggested edits to language that appears on specific pages in the RSAP. Text in red are suggested additions/modifications.
		EXECUTIVE SUMMARY
2	0.0 Executive Summary	(First bold sentences)...including homes and businesses, and shut down freeways, roads, and mass transit stations. These events also present a threat to the Bay and the ecological health of the Baylands,
2	0.0 Executive Summary	Global sea level rise is already being felt in the Bay Area. It has disrupted daily life and damaged the region's natural habitats and built infrastructure. Flooding from high tides, storm surge, and heavy rainfall have damaged the region's built environment, including homes and businesses, and shut down freeways, roads, and mass transit stations. These events also threaten the ecological health of the Baylands, reduce access to public trails and parks, and send untreated wastewater into the Bay. Replace with: Global sea level rise is already being felt in the Bay Area. It has disrupted daily life and damaged the region's natural habitats and built infrastructure. Flooding from high tides, storm surge, and heavy rainfall have damaged the region's built environment, including homes and businesses, and shut down freeways, roads, and mass transit stations ¹ , reduced access to public trails and parks, and sent untreated wastewater into the Bay² . These events also threaten the ecological health of the Baylands which provide essential ecosystem services that support the economy of the Bay Area and provide resilience for the Bay and our communities.
2	0.0 Executive Summary	...commuter rail lines, and loss of tens of thousands of acres of habitats for depressional wetlands lagoons and marshes. The region's response to sea level rise depends on recognizing that working with nature, integrating natural adaptation strategies into strategic flood risk planning, will provide more effective long term regional resilience for both the built environment and the Bay. Preparing for and actively preventing such extensive damage will be expensive, therefore strategic planning
3	0.0 Executive Summary	End of second column - The San Francisco Bay Plan (Bay Plan) is BCDC's guiding policy document for implementing the laws as outlined in the McAteer Petris Act of 1965. Since then, the region has witnessed robust growth and public access to the Bayfront and Bay ecological health have been steadily improving. In 2011, BCDC updated the Bay Plan to include Climate Change Policies.
4	0.0 Executive Summary	Second column near top- There are different approaches to adaptation, ranging from avoiding new development in places that will flood to protecting existing development with shoreline infrastructure or even relocating assets out of harm's way, while also protecting and restoring Bay habitat
4	0.0 Executive Summary	Second column second para- This document is designed to move users toward outcomes that are more equitable, protect and expand shoreline ecosystems and habitats , increase access to the shoreline and shoreline_x0002_dependent uses, and balance...
	1.1	THE IMPORTANCE OF ADDRESSING SEA LEVEL RISE IN THE BAY AREA
10	1.1	"These events, and our history of development along the Bay's shoreline , also threaten the ecological health of the Baylands..."
11	1.1	"Over 20,000 acres of habitats for depressional wetlands, lagoons and tidal marshes that will no longer be able to support a diversity of wildlife, habitat for endangered species, support recreation and tourism, provide climate resilience, clean the air and water and support 70% of our commercial fisheries among other ecosystem services."
12	1.1	Replace page 12 with new page provided which includes examples of benefits to the economy provided by protection of healthy thriving Bay habitats and prioritization of the use of NNBS
	1.2	THE REGIONAL SHORELINE ADAPTATION PLAN DRIVES ADAPTATION REGIONALLY
15	1.2.2	On this page, subregional plans: needs some edits, such as "...collaboration and partnership with broader group of stakeholders will be essential in the creation of comprehensive adaptation planning."
	1.3	SB 272, THE BAY PLAN, AND THE STATE CONTEXT FOR ADAPTTION PLANNING
16	1.3	Bold face the following sentence as it is important as the "carrot": Local governments that receive approval from BCDC and their respective agency will be prioritized for funding for the implementation of sea level rise adaptation strategies and recommended projects in the approved plan.
18	1.3.2 BCDC, the Bay Plan, and Bay Adapt: Regional Strategy for a Rising Bay	The San Francisco Bay Plan (Bay Plan) is BCDC's guiding policy document for implementing the laws outlined in the McAteer Petris Act of 1965. As a result, the Bay has been slowly recovering from a century of damage from filling, dumping and pollution.
19	1.3.2	Task 1.1: Create a long-term vision rooted in communities, Bay habitats and the economy.
	1.4	SEA LEVEL RISE RISKS AND OOPORTUNITIES IN THE BAY

22	1.4.1	The Bay Area is no stranger to hazards — earthquakes, wildfire, and flooding are a natural part of life along the Northern California coastline. Yet as global climate change further disrupts local weather patterns, flood hazards are becoming more common, widespread, and severe, putting communities, infrastructure and the Bay ecosystem itself at risk.
22	1.4.1	Sea level rise poses risks not only to those living near the water's edge but will also disrupt regional transportation systems, critical and emergency services, housing markets, economies, recreation spaces, and Baylands ecosystems, including the essential functions and services they provide. Coastal flood hazards exacerbated by sea level rise are the focus of the RSAP. Subregional Plans are required to address regional goals with local shoreline-appropriate strategies for rising tidal inundation.
26	1.4.1	Sea Level Rise Worsens Existing Coastal Flooding Hazards Sea level rise can be considered a "threat multiplier" ... and limited shoreline access, while increasing stress on Baylands habitats and ecosystems and water-dependent shoreline uses.
28-29		Replace pages 28-29 with new pages provided. Includes a definition of NNBS
31	1.4.2	Comment: under the description of what "prepare" means, it is important to spell out that "protect" also means protection of existing baylands habitats as well as restoration of existing tidal wetlands, beaches, oyster reefs, etc.
31	1.4.2	Comment: "Prepare" can also mean putting NNBS into place now so the ecosystem services have time to develop and mature before services like wave and flood attenuation are needed.
31	1.4.2 We like this. This is an important statement. DO NOT REMOVE	Avoid strategies may be particularly useful for areas that are not anticipated to have high development pressure in the future, have such high risk that development would not be financially feasible, and/or areas well suited to be wetlands migration space and upland transition space.
32	1.4.2	Uses and interests consistent with BCDC's mandate and the public trust include water-related commerce, navigation, fishing, bathing, swimming, and boating, as well as public access, recreational uses, and the preservation of lands in their natural state for Bay habitats and ecosystems and for open space. The shoreline contains diverse recreational uses and provide opportunities for boating, walking, jogging, biking, hiking, fishing, and swimming and enjoying nature.
33	1.4.2 first column	But these habitats are threatened by sea level rise. As coastal flood hazards increase, habitat types will be forced to shift – tidal wetlands will have to move to upland transition zones, and open Bay water will drown existing tidal wetlands – and critical ecosystem services will change or be lost.
33	1.4.2	Replace Page 33 with new page provided that includes a box with ecosystem services provided by Baylands
34	1.4.2	the next generation will inherit inherent a new landscape..."
35	1.4.2 last paragraph title	Create Adaptation Pathways to Respond to Changing Flood Risks Over Time
there are two pg 36 - this is first 36	1.4.2	Pg. 36a. "In some cases, the most logical or desirable housing sites may be along the at-risk shoreline. Highly developed urban shorelines might also be significant sources of revenue for cities via commercial and industrial uses. These factors may provide a strong motivation to protect shorelines in place, and in fact future development can provide an opportunity to protect both new and existing development by funding new adaptation and resilience measures that provide benefits to cities and communities." However, this must be balanced by need to preserve and restore Bay ecosystems. Unless in already developed shorelines, that are planned to be protected, new housing should avoid being proposed for at-risk shorelines.
36	1.4.2	On this page, a variety of communities are defined. A definition of Frontline Communities is needed. All definitions on page 36 should also be listed in the Glossary, with hyperlinks to the Glossary whenever the terms are used throughout the document.
	2.1	ONE BAY VISION FOR A RESILIENT FUTURE SHORELINE
40	2.1	Equitable engagement and outreach! Good job. For details, see Appendix, p. 181-3, 184-6
42	General comment about Regional Goals and Priorities	General Comment: In several places the term "Regional Goals" is used but these are not defined or included anywhere in the document. One important Regional Goal is achieving 100,000 acres of tidal wetlands regionally. We are currently at around 54,000 acres. Include wording about this regional goal on page 50 Section 2.3.2
	2.3	TOPIC AREAS - REGIONAL TO THE LOCAL PERSPECTIVE
50	2.3.2 Ecosystem Health and Resilience	Replace Page 50 with new page provided that includes new information about Regional Goals for wetlands. One important Regional Goal is achieving 100,000 acres of tidal wetlands regionally. We are currently at around 54,000 acres. Therefore this is a very specific Regional Goal and a Regional Priority that needs to be articulated somewhere - maybe here.

50	2.3.2 Ecosystem Health and Resilience	Question: Why does the footnote on page 50 refers to an SFEP document from 2012 when SFEP released the updated Estuary Blueprint in 2022 - Is this a typo? It needs to be corrected
51	2.3.2	Comment: Nice list of assets to be included in adaptation plans, but: What are contamination levels? Any capped sites? Shoreline contamination and landfills are a threat to Bay Ecosystem Health - where will this be covered?
53	2.3.2 Ecosystem Health and Resilience	STRATEGIC REGIONAL PRIORITY: Complete and Connected Ecosystems Also refer back to important Regional Goal of achieving 100,000 acres of tidal wetlands regionally.
53	2.3.2 Ecosystem Health and Resilience	(Box) ASSETS AND DATA SOURCE(S) Baylands habitats and opportunities for restoration, as identified by the San Francisco Estuary Institute (SFEI) Baylands Habitat Map and SFBJV Implementation Plan, opportunities for upland connectivity, as identified in the Adaptation Atlas (SFEI & SPUR), and suitability for subtidal eelgrass and shellfish reefs.
55	2.3.3	Comment: Under Assets to be Included in Subregional Shoreline Adaptation Plans, good recommendation to assess both public and private parcel ownership.
57	2.3.3	Comment: Excellent page advocating housing near transit. But assumes that development can be integrated with adaptation strategies, even in the case of a vulnerable shoreline. But new development may not be possible in all cases. An important concept is that new development should happen ONLY when existing biological assets are protected and enhanced.
59	2.3.4	Another list of assets to be included... This list centered on infrastructure, stormwater, emergency services, marinas and harbors (does this include port facilities?)
60	2.3.4	Comment: Chevron Refinery is included in water-related industry priority use areas, but not ports or harbors or Coast Guard facilities
62	2.3.5 Public Access	(box) Balance the need for human enjoyment, sustenance, and cultural connection to the Bay with protecting habitats from human activity
66	2.3.6 Transportation	Identify and integrate multi-benefit opportunities, such as improving ecological health and habitats , utilizing green infrastructure, and expanding public access, with transportation projects.
68	2.3.6 Transportation	Comment: Map Figure 2-13 Transportation may have an inaccuracy in Redwood City
69	2.3.6 Transportation	(in Box) Areas along the Bay shoreline containing identified regionally significant transportation infrastructure must include effective strategies to ensure the continued functioning of these services. Continued functioning could be achieved through a range of adaptation approaches to reduce flood risk, such as protection, avoidance, accommodation, relocation, and preparation, and these approaches can change over time through adaptation pathways, including incorporating nature-based solutions to the greatest extent feasible.
70	2.3.7 Contamination	(In Box) • Collaborate with communities, scientists, industries, and government agencies to identify, mitigate, adapt, and remediate contaminated shoreline sites for public health as well as Bay water quality and ecosystem concerns
70	2.3.7 Contamination	Comment: Shoreline contamination section: Very idealistic, in terms of collaboration with industries and government agencies. Excellent recommendation that previously remediated sites may need to be re-evaluated. But second bullet prioritizes remediation only in EJ communities. What about other communities? How can the Bay be protected if only some sites are remediated? What about prioritization of sites that are more likely to affect Bay ecosystems and public health? Embryonic stages of fish and crab and other ecosystem animals can be extremely vulnerable to toxins.
71	2.3.7 Contamination	REQUIRED to assess only contaminated sites, landfills, superfund sites. RECOMMENDED (but should be REQUIRED) to assess brownfield sites (brownfield sites are contaminated; they usually have fewer contaminating chemicals). Even the EPA is wishy-washy about the distinction between Superfund and brownfield sites. What about buildings/land uses that contain hazardous materials (Chevron refinery?) and oil spill risks (ports and wharfs, storage tanks?). What about the superfund-qualified Zeneca site in Richmond (and other sites elsewhere) that is (are) currently under cleanup? A re-evaluation of plans for the controversial Zeneca site would be an excellent idea, particularly because original plans may not have taken adequate sea level rise into consideration such that public health and Bay ecosystems will be protected.
72	2.3.7 Contamination	INACCURATE MAP OF SUPERFUND SITES: United Heckathorn not indicated as a Superfund site, Zeneca site does not seem not to be indicated. Unclear what red spots at Berkeley marina landfill and Richmond landfill indicate; legend differs. And a substantial limitation is that only known sites are shown. Richmond is doing an inventory of shoreline sites that includes previously unidentified sites.
73	2.3.7 Contamination	(At top text- 2nd col) There is significant uncertainty about how flooding and rising groundwater will exacerbate contamination and increase public health and Bay water quality concerns if contaminants are mobilized, or how dry land cleanup standards will perform if lands become submerged.
77	2.3.8 Govern,funding	Excellent emphasis on reducing flood risk across jurisdictional boundaries.

	3.1	SUBREGIONAL PLAN ELEMENTS
82	3.1.1	ELEMENT A Planning Process Consider changing title to PLAN PROCESS for consistency with later sections
83	3.1.1 ELEMENT A - PLAN PROCESS	Participation should include representatives from at least the following areas of expertise: local planning, public works, emergency management, public health, transportation, parks and recreation, environment and sustainability, and Baylands ecology and habitat, and the use of NNBS.
	3.1.2	ELEMENT B: EXISTING CONDITIONS
90	3.1.2 B-2 b)	EXISTING CONDITIONS: Coastal and nearshore hydrological conditions. Describe and map the existing coastal and nearshore hydrological characteristics, including high tides, 100-year still water elevation, FEMA Flood Mapping (100-year and 500-year storms), wave climate, and the location of creeks and streams, and depth to shallow groundwater table.
91	3.1.2. B2 c)	This includes spatial extents of subtidal habitats (including eelgrass), intertidal flats, tidal marshes, diked Baylands, beaches, rocky intertidal, estuarine-terrestrial transition zones, adjacent uplands, and creeks and channels connected to the Bay in the planning area. A description of habitat resilience characteristics, ecosystem services and functions of these habitats, and the presence of state or federal listed endangered species and state species of special concern must also be provided.
91	3.1.2 B2 d)	Proposed language: Planned and Potential future changes. Describe any planned future shoreline changes, including adaptation, restoration, or other shoreline flood protection projects in the planning area. Also include other adaptation, restoration or other NNBS shoreline changes that have been identified as potential shoreline resilience projects (as indicated in the SFEI Adaptation Atlas or other resources [footnote - SFBJV, Baylands habitat Goals, etc]) but have not yet been planned. Identify where planned future projects cross jurisdictional boundaries.
91	3.1.2	Comment: MUST include language regarding dangers to ecosystem health, example - Stege Marsh near Zeneca; DDT at United Heckathorn. How can Planned Future Changes include cleanups when DTSC and Water Board and EPA have not revealed any plans or made any commitments? Contaminated sites are very common in EJ communities.
92	3.1.2 B3 c)	c. Services should include ecosystem services
92	3.1.2 B-3 c)	Critical infrastructure and services conditions. Map (when applicable) and ... stormwater systems, emergency management centers and public safety, fire stations, police stations, marinas, harbors, and other water-dependent infrastructure. Comment: natural baylands habitats are considered "natural infrastructure" in other parts of the US where they provide wave and flood attenuation - they should be identified in existing conditions as a part of flood reduction infrastructure.
93	B3 f)	Comment: B3f. Shoreline contamination conditions should include all contamination. Definitions exclude brownfields etc., but it is important to know about all conditions because that will influence the choice of adaptation. Plus applications should cover a search for previously unidentified sites. Effects of contaminants on local population and ecosystems should be evaluated.
98	3.1.3	ELEMENT C: VULNERABILITY ASSESSMENT
98	3.1.3	Vulnerability Assessment: Public health and ecosystem health mentioned in the first sentence, but not again. These should be incorporated into every paragraph. In particular, with respect to exposure of residents and ecosystems to toxins as a result of sea level rise and shallow groundwater rise.
99	3.1.3 C1, c)	(Add another item at end) C1, c) Bay Habitat and Ecosystem risk conditions. Assess and describe the near shoreline Bay ecoservices that the subregion and the region depend on for clean water, nutrient removal, air quality, carbon sequestration as well as for habitat supporting avian and aquatic wildlife. Include hydrology and bathymetry, to fully describe intertidal conditions, and habitat ecology for species support. Include information on endangered species and listed species of special concern.
101	3.1.3 C2 c)	Appreciate that "Baylands habitats" are listed as a Priority action area
103	C4 box	ASSETS AND AREAS OF SIGNIFICANCE To conduct an effective vulnerability assessment, it is important to narrow down the wide range of potential assets and focus on specific populations, assets, and services that are of high priority to the region as a whole and to participating jurisdictions.
103	C4 same Box	(In BOX) Assets and areas of significance near end of first para. ...Also consider where damage to a specific asset (for example, a heavily used bridge or telecommunications infrastructure) could initiate multiple failures across other sectors within a community , to Bay habitats or beyond. Local communities should be involved in helping to identify local priorities,

103	C4 Box 2	"PRIORITY ACTION AREAS box: A priority action area includes geographic locations that contain high vulnerability and high priority to local communities and the region. These areas determine where adaptation strategies must be developed in greater detail to respond to and reduce the risks of flooding and damage in that location, which will be carried forward in Element D: Adaptation Strategies and Pathways. Priority action areas build upon the initial areas of significance identified and confirms what should become a priority action area based on the results of the vulnerability assessment. An example of a priority action area would be an area that includes a number of high priority populations, assets, services and/or habitats or potential for migration of wetlands and where, if the area were to be damaged, disrupted, or lost to flooding there would be significant consequences to the communities, ecology, or economy of the jurisdiction."
	3.1.4	ELEMENT D: ADAPTATION STRATEGIES AND PATHWAYS
107	D2 a)	Adaptation alternatives. Describe at least two adaptation alternatives for the shoreline and the near-shore Bay containing adaptation strategies for each shoreline reach that respond to summarized vulnerability by reach (C4-b), incorporate the planning area assumptions (D1-a), advance the local and One Bay Vision (D1-b), and meet the Adaptation Strategy Standards.
109	D3 a)	Comment: Require metrics against which progress can be assessed after 5 years. Give some examples of metrics for shoreline and near-shore ecosystems or habitat
110	D.4.c)	Comment: Adaptation Strategy Standards Matrix: Clarify here, and in the matrix itself, that the short description of required submittals in the matrix does not limit the scope of the Standard. Compliance with the full scope of the standards is required and should be described in the matrix response.
110	D.4.c)	Adaptation Strategy Standards and the Matrix Checklist: Describe how the Adaptation Strategy Standards have been incorporated into the preferred adaptation strategies and pathways to the maximum extent possible. Using the Adaptation Strategy Standards Matrix Checklist in Section (correction) 3.3.3 as an outline , include 1) if standards are being met, 2) if not, a description of why they are not being met, and 3) where in the plan, the outcomes, including metrics for the standards can be found.
114	Examples of Land Use	Excellent list of examples of potential land use changes
	3.2	MINIMUM STANDARDS
130	3.2.1 Coastal Flood Hazards and Sea Level Rise Scenarios Standard	BOX Shallow Groundwater and Groundwater Emergence: add a last sentence: Shallow groundwater maps and contamination maps should be included in Plans as rising shallow groundwater can mobilize buried contaminants. Where additional local information is available, it shall be included.
131	3.2.1	Coastal Flood Hazards needs its own box for emphasis. Good list, but should include tsunami risk (for some areas) and storm water flooding risk needs stronger acknowledgement for potential needed coordination. Needs a better term than "combined coastal flood hazards and sea level rise scenarios. Maybe something like multi-causal flood risk?"
134	3.2.2 Minimum Categories and Assets Standard	End of first column • Element D: Adaptation Strategies and Pathways, to develop adaptation strategies in response to identified risks. Add 2 bullets after Element D: • Element F: Project Implementation Plan and Funding Strategy • Element G: Project List
135	Bay Ecosystem Health and Resil	Habitat resilience characteristics (qualitative) - Check box as SRP
135	3.2.2	In addition to including contaminated sites here as minimum assets, the RSAP should encourage policies and strategies to identify contaminated sites that have not yet been discovered.
138-139	3.2.3	Checklists for diversity and equity excellent. Bio resources need same level of thought.
135	3.2.4	ADAPTATION STRATEGY STANDARDS
142	3.2.4 Adaptation Strategy Standards	Second column: This standard is used throughout the Subregional Plan Elements, including: (insert this item) Element B: Existing Conditions, to understand existing habitats and natural ecoservices benefiting the subregion, and habitat and ecosystems the subregion is deficient in but could include for resilience
143	Overview of Adaptation Strategy Standards	12. Use nature-based adaptation solutions to the greatest extent feasible before using traditional hardscape approaches
143	Overview of Adaptation Strategy Standards	Insert a new item # 15. Examine adaptation pathway strategies, with phases over time, to incorporate plan flexibility and to include time for nature-based solutions to adapt and create resilient flood protection. Change #15 to #16. consider combining #s17 and 18

145	3.2.4 #4	Adaptation Strategy Standard 4 says "must protect, restore, and/or enhance these [existing Baylands] habitats to meet regional habitat goals...." But there's no definition of "habitat goals." The only other mentions anywhere in the plan are minor footnotes citing SFEP's Habitat Goals as a reference for the RSAP's definition of Baylands (pp. 50, 190). Standard 4: "Improve Baylands habitats and facilitate their long-term survival. Areas along the Bay shoreline with existing Baylands habitats must protect, restore, and/or enhance these habitats to meet regional habitat goals.... In the adaptation strategies, demonstrate and describe how Baylands habitats and their characteristics are expected to change from the existing conditions and how they will be protected or improved. In addition, describe how the strategy contributes to enhance and increase habitat to meet regional goals (footnote SFEP, SFB-JV and add definition somewhere early in the RSAP narrative and glossary identifying the SFEP targets), and if it does not, why not. "
145	3.2.4 #4	Strengthen Adaptation Standard 4: "... Adaptation strategies that would significantly affect Bay resources (including Baylands habitat ecosystems), such as flood gates , disruption of landfill caps/containment or other legacy contamination, or human intrusion into sensitive habitat areas, must be avoided.
145	3.2.4 #5	Adaptation Strategy Standard 5 requires ensuring complete and connected ecosystems where existing Baylands habitats cross jurisdictional boundaries. Comment: Shouldn't this be required for intra-jurisdiction connections as well (creek connections, wildlife corridors, etc)? "... In the adaptation strategies, demonstrate and describe where habitats currently, or have the potential to in the future, cross jurisdictional boundaries and describe coordination efforts with neighboring jurisdictions, private, state, and/or federal managers and/or landowners to maintain habitat connectivity for landscape-scale habitat processes."
146	3.2.4 #6	Comment: Standard 6: If existing development along the shoreline is on or near contamination sites, then there should be information provided regarding how sites will be cleaned up AS WELL AS flood risk will be minimized.
148	3.2.4 #11	Strengthen Adaptation Standard 11: "...must identify strategies to advance remediation and reduce risks of toxic materials mobilization and vaporization in communities due to flooding and non-emergent shallow groundwater and due to disruption related to implementation of adaptation strategies...."
148	3.2.4	Add a shoreline contamination Standard for non-EJ communities
148	3.2.4 #11	For purposes of clarity we suggest the following edits: "Areas along the Bay shoreline containing identified contaminated sites in Environmental Justice communities must be identified as well as strategies identify-strategies to advance remediation and reduce risks of toxic materials mobilization and vaporization in communities due to flooding." This is to avoid the misinterpretation that the burden of the responsibility, instead of the opportunity to identify where these contaminated sites are located and strategies identified, falls on the shoulders of the EJ community
150	3.2.4 #16	Strengthen Adaptation Standard 16: "Areas along the Bay shoreline containing assets and/or Baylands habitats at risk of flooding or non-emergent shallow groundwater impacts... This must include standards, codes, and/ or policies that address shallow groundwater and groundwater emergence flood risks. Mobilization and vaporization of contaminants must be addressed with regards to both movement of water and disruption related to implementation of adaptation strategies...."
	3.3	COMPLETE PLAN SUBMITTAL CHECKLISTS
156	3.3.1 Subregional Plan Checklist D1 b)	D1 b) Local vision and goals statement(s), including meeting regional goals , and goals for the full planning area, and responses to the Equity Assessment.
156	3.3.1 Subregional Plan Checklist D4 c)	Matrix of compliance with Adaptation Strategies Standards Matrix Checklist.
	3.3.3	ADAPTATION STRATEGY STANDARDS MATRIX CHECKLIST
160-162	3.3.3	Comment: Adaptation Strategy Standards Matrix Checklist needs to be reorganized. As is, it places each Standard into one of 3 categories - creating a silo effect. Standards 4, 11, 12, 15, and 16 should all be listed under all three categories: Maximize benefits of water-dependent shoreline uses and Baylands habitats; Improve community health, economic development, and housing needs; and Create pathways to respond to changing flood risks over time.

160	3.3.3 #12 Use Nature-based Adaptation first whenever possible	<p>Comment: The Adaptation Strategy Standards Matrix fails to convey the full import of the requirements in the Adaptation Strategy Standards. If planners go only by the checklist, rather than describing their implementation of the entire standard, the description may be inadequate to demonstrate compliance. For instance, for Adaptation Strategy Standard 12, a jurisdiction could meet the matrix requirement by describing one or more unsuitable NBS strategies, but that provides no indication as to whether they incorporated NBS to the "greatest extent feasible". The instructive narrative for the matrix checklist in sec. 3.3.3 should indicate the descriptions for submittal requirements are abbreviated for ease of use and that the matrix response for each standard must describe compliance with all aspects of the Standard. Otherwise, each matrix description should be revised to capture the full intent of the Standard. (a hyperlink may also be useful)</p> <p>For example, the most important requirement in Adaptation Strategy Standard 12 is "In areas along the Bay shoreline where protection approaches for flood risk reduction are utilized, adaptation must incorporate natural and nature-based adaptation strategies suitable to the landscape to the greatest extent feasible before using traditional hardscape approaches..." But that is not reflected in the required action/reporting description carried over to the Adaptation Standards Matrix Checklist (Sec. 3.3.3, p. 161): "Demonstrate and describe the suitability of nature-based solutions and where nature-based adaptation is used. Identify all natural and nature-based strategies that were considered but rejected, and describe why they were deemed infeasible."</p>
160	3.3.3 #4	Demonstrate and describe how Baylands habitats and their characteristics they are expected to change from the existing conditions and how these will be protected or improved as sea levels continue to rise.
160	3.3.3 #4	Demonstrate and describe how Baylands habitats and their characteristics they are expected to change from the existing conditions and how they will be protected or improved.
	3.5	TOOLS TO SUPPORT PLAN DEVELOPMENT
175	3.5.1 (In Box)	Habitat Information in Existing Plans When using existing plans, it is important to carefully review and consider how information about specific Baylands habitats and species, especially along the gradient of subtidal, intertidal, and uplands, is characterized and incorporated. These habitats provide important ecosystem services. This information may not be available and/or adequate in existing plans and additional evaluation may be necessary to supplement this information for compliance with the Guidelines..... ADD at end This is important, as protecting and improving Bay ecosystem health, using nature-based solutions, will improve community resilience.
	4.3	RECOMMENDED COASTAL FLOOD HAZARDS AND ASSETS
187	4.3.1	Why is the following Coastal Flood Hazard , which is included here,also not required in a Vulnerability Assessment and addressed in adaptation pathways. 4.3.1 Additional Coastal Flood Hazards "Shoreline Erosion and intertidal habitat conversion (due to increased inundation and erosion)"? It clearly provides an insight into what tools might be useful for resilience and also helps reveal how Bay Ecosystem health is being affected by sea level rise which, in turn, helps identify how much bay habitat adaptation is necessary to maintain Bay health. Please make this a requirement in Vulnerability Assessment etc..
190	Glossary See ALSO Attachment A for an expanded Glossary	Should include Nature Based Solutions and Nature Based Adaptation in the Glossary and should be consistent in using one or the other term but not both unless they make a distinction between "Solution" and "Adaptation".
	General Note	Metrics for adaptation appear to be missing from the Guidelines. No plan can be easily evaluated for progress unless there are some metrics for overarching regional priorities as well as some metrics for local priorities that are in line with the Bay Adapt goals and the One Bay Vision goals.

COMMENT #253

From: REBECCA Groves <rebeccagroves@mac.com>

Sent: Friday, October 18, 2024 4:59 PM

To: BCDC PublicComment <publiccomment@bccdc.ca.gov>

Subject: RSAP

Thank you to everyone who worked so diligently to produce the Regional Shoreline Adaptation Plan!

I respectfully urge the BCDC to consider incorporating goals and strategies for improving the water quality of the Bay and developing access and amenities to support an expanded network of sites around the Bay suitable for public swimming.

The plan briefly gestures towards maximizing the benefits of water-dependent shoreline uses and mentions BCDC's mandate to promote public access and water recreation, including bathing and swimming, but this commitment should be much more explicit to ensure that as the shoreline is re-engineered to prepare for sea level rise, the myriad benefits to the community can be realized.

Thank you!
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San Francisco

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[LinkedIn](#)

COMMENT #254**From:** M HP <meekerlibra35@gmail.com>**Sent:** Friday, October 18, 2024 5:00 PM**To:** BCDC PublicComment <publiccomment@bccdc.ca.gov>**Subject:** RSAP

I am extraordinarily grateful to have been able to participate in the RSAP. I want to give thanks and acknowledge the exceptional work of Jackie Perrin-Martinez, Phoenix Armenta, Jessica Fain, Dana Brechwald, the BCDC EJ Advisors, the RSAP Advisory group, Mithun, Greenbelt Alliance, the CBOs and all the other project partners. This is a complex and complicated process, and I think the language of the RSAP is pretty clear and a good start. I hope that the state provides BCDC with continued funding not just for now but consistently through the next decade on. I hope BCDC leadership continues to seek opportunities to garner state support and funding for staff. We need staff to be well funded so that as the plans are submitted there are sufficient personnel and resources available.

I want to acknowledge the comments of BCDC Commissioner Barry Nelson, as there were many comments made at the October 17, 2024, public hearing that implied the RSAP language was vague or non-existent on a number of things. Commissioner Nelson's acknowledgment of the RSAP language is exactly the support BCDC staff needs. Lastly, I want to express that I do hope jurisdictions do indeed move through this process with sincerity in ensuring the equity assessment is met and that nature-based solutions that include full community engagement are considered.

Thank you for the opportunity to comment.

Sincerely,

Miyko Harris-Parker

COMMENT #255

PDF – San Francisco Bay Area Planning and Urban Research Association (SPUR)



San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105

October 18, 2024

RE: Public Comment on BCDC's Regional Shoreline Adaptation Plan

Dear Bay Conservation & Development Commission,

Thank you for your work on the Regional Shoreline Adaptation Plan. The RSAP is a sophisticated and complex document covering a broad range of goals that will guide future sea level rise adaptation practices in our region and beyond. The document recognizes tradeoffs, competing interests, and the complex policy environment and is a critical first step for regional coordination and collaboration.

SPUR works to create an equitable, sustainable, and prosperous region by balancing the region's housing, transportation, land use, economic growth, sustainability, and hazard resilience needs. The RSAP's One Bay Vision and Strategic Regional Priorities reflect the values of SPUR. We support the document's emphasis on community engagement, nature-based solutions, and the ways in which climate change and sea level rise spotlight our interconnectedness and reliance on each community and jurisdiction's capacity to adapt and thrive. The RSAP reflects intentionality in the next phase of our regional planning efforts in response to climate change.

Thank you for the opportunity to participate in the public comment process and contribute to finalizing this important guidance document. Please see our recommendations below, SPUR and Greenbelt Alliance look forward to continuing to work with BCDC on this effort.

Regional Shoreline Adaptation Plan Document Update Feedback & Recommendations:

1. **Housing & Displacement:** We appreciate the RSAP's goal to plan new and re-development projects that ensure community safety, equity, and Bay ecological health while considering the long-term vitality of our shorelines and communities. To advance the strategic regional priorities of safe growth and reducing involuntary displacement, we suggest these amendments:
 - a. *Emphasize that the adaptation strategy of "avoid" must align with regional housing needs:* Expanding development into increasingly vulnerable areas, especially to multiple hazards, will likely expose more people and structures to risk. Building new structures in high-risk or very-high-risk areas should be avoided in favor of prioritizing housing and job growth in safer, more insurable locations with existing infrastructure to accommodate new residents and workers. There are many infill areas throughout the Bay Area that are well-suited for housing development, the region does not need to place new housing development on currently undeveloped high-risk sites that would be better suited as public open space or space for natural ecosystems restoration. Still when implementing an "avoid" strategy, subregional plans must balance actions to ensure that there is no net loss of planned housing (see Recommendation 7 in SPUR's [Safety First Report](#) and SPUR's [Regional Strategy](#)).
 - b. *Include manufactured home parks (MHPs) in the list of required assets to assess in sections 2.3.1 and 2.3.3:* MHPs are critical because 1.) they are an essential source of affordable

housing and home ownership, and 2.) There are a number of these communities [located along the Bayshore in flood zones](#) (ex. South Bay Mobile Home Park, Belmont Trailer Park), 3.) MHPs [are often overlooked](#) in planning efforts.

2. **Groundwater Rise & Combined Flood Risks:** The RSAP effectively acknowledges the risk of shallow groundwater rise across the region, and we look forward to the updated ART Flood Explorer incorporating groundwater rise. Still, we recommend that BCDC's flood mapping tool incorporate projections of flood extents in the case of overlapping or simultaneous coastal flood events. Using flood overlays without acknowledging combined flood risk may lead to a subregion underestimating flood hazards, which could significantly change their adaptation approach.
3. **Shoreline Contamination Risk:** We appreciate the call to action in the RSAP for contaminated site clean-up along the shoreline to further this strategic priority, we suggest a few amendments to the document language and planning.
 - a. *BCDC should explicitly acknowledge how past land use planning practices (e.g. redlining and de facto discrimination) contributed to the concentration of contaminated sites in lower-income communities of color and how the RSAP, Subregional Plans, and shoreline adaptation efforts must both acknowledge these inequities and ensure that both clean-up efforts and general adaptation plans prioritize the health, social cohesion, and livelihoods of frontline communities.*
 - b. *The RSAP should recommend that subregional coalitions work with the local community to prioritize clean-up sites across the subregion. With limited financial resources available for shoreline cleanup, prioritization of sites will be key. Climate Resilient Communities has already developed a tool that could be used as a template for community prioritization.*
 - c. *The creation of a convening authority to ensure collaboration of regulatory agencies in subregional plans will be critical to advancing this priority. Addressing shoreline contaminated sites will require collaboration with key regulatory agencies like the DTSC, the State/Regional Water Board, and the EPA. In the RSAP, it is currently unclear how BCDC will support subregional coalitions in coordinating with these agencies. BCDC must explore options for guiding regional collaboration with regulatory agencies to achieve this priority.*
 - d. *The map of contaminated sites on page 72 should be updated to include those located just outside of census tracts with a CalEnviroScreen score of 75 or greater, sites at risk of stormwater flooding and groundwater rise, high-risk [closed sites](#) that could still contribute to contaminant mobilization and health impacts (see SPUR's [Look Out Below](#) Report). In East Palo Alto, as an example, the majority of contaminated sites are located in the northeastern corner of the City in a census tract with a CalEnviroScreen score below 75. This cluster of sites, adjacent to a vulnerable community, shouldn't be overlooked by arbitrary census boundaries. Furthermore, the map shows only sites that are open/active, even though groundwater rise [may cause contaminant mobilization at closed sites](#) that have been remediated through strategies like capping. The use of the map should also be clarified: are the sites identified in the map the only ones that a subregion is required to assess? Please provide further guidance.*
 - e. *BCDC should require that Subregional Coalitions include both low-resourced and high-resourced jurisdictions in order to share/equitably distribute the resources that will be needed for planning, managing, and implementing costly shoreline adaptation projects.*

4. **Examples of local policy, program, and project best practices for shoreline adaptation:** We recommend that the RSAP or another tool produced by BCDC showcase sea level rise adaptation policy and development best practices that BCDC would like to see reflected in Subregional Adaptation Plans. Examples Include:
 - a. [Burlingame’s Sea Level Rise Overlay Zone](#) provides guidance for new development in advancing sea level rise resilience. Within the zone, new flood protection infrastructure must be built [six feet above the hundred-year flood elevation](#), with the first floor of new buildings at least three feet above that elevation. This zoning update was adopted in 2021.
Note: Overlay zones should also include design and retrofit requirements for underground infrastructure, and roadways (See SPUR’s [Look Out Below Report](#) & Oneshoreline’s [Planning Guidance](#)).
 - b. SFPUC [Floodwater Grant Program](#), with up to \$100,000 reimbursement for eligible properties for implementing flood-proofing projects. *Note: Grants that require upfront payments with reimbursement may exclude low-income homeowners.*
 - c. [City of San Mateo Stormwater Fee](#): The dedicated revenue from this property tax will be used to fund repairs and improvements of aging stormwater infrastructure, which includes underground pipes, levees, and pumps. The policy was adopted in January 2024. *Note: Stormwater fee funding should be made available for green infrastructure projects, and fees should be set at a level that is feasible for new housing construction and does not overburden low-income residents.*

5. **Examples of multijurisdictional and/or multi-agency governance structures that can be used as models or structures for subregional planning:** We recommend that the RSAP or another tool produced by BCDC showcase multijurisdictional governance models that BCDC envisions could be replicated or transitioned to support the development of Subregional Adaptation Plan coalitions. Examples include:
 - a. Hayward Shoreline Planning Agency ([HASPA](#)): A joint powers agency consisting of leaders from the City of Hayward, East Bay Regional Park District, and Hayward Area Recreation and Park District.
 - b. [Oakland Alameda Adaptation Committee](#): A coalition of shoreline communities co-creating a coordinated subregional adaptation plan organized around the [San Leandro Operational Landscape Unit](#) (OLU). OAAC developed a white paper in August 2024 outlining potential governance strategies, this information should be shared with the broader region.
 - c. [21 Elements](#): A multi-year collaboration of all 21 city and county governments in San Mateo County and partner organizations to develop, adopt and implement local housing policies.
 - d. San Mateo County Flood and Sea Level Rise Resiliency District, [Oneshoreline](#): An independent government agency working across the County’s shoreline to address sea level rise, flooding, and coastal erosion. Oneshoreline was launched with start-up funding from the County and 20 incorporated cities.

Recommendations for BCDC on Implementing the RSAP:

1. **Develop additional tools to support effective subregional planning:**
 - a. *Develop a shoreline adaptation funding and financing guide that explores not only existing, competitive, (and unreliable) state and federal funding opportunities but also local funding and financing mechanisms.* Guidance should explore how to advance local policies to expand funding without disrupting housing development or burdening low-income households. Local funding and financing mechanisms could include special district parcel taxes, property fees, bonds, regional tax sharing, a regional resilience trust fund (Recommendation 12, SPUR [Safety First Report](#)), etc. SPUR would like to offer support in developing this guide.



Furthermore, to address competition in state and federal grant applications, BCDC should develop a funding prioritization tool to direct funding to projects that advance regional priorities and address areas with the greatest vulnerability now.

- b. *Provide a decision-making guide for the proposed adaptation approaches that take into account potentially conflicting priorities such as shoreline protection and maximizing infill development to address housing affordability.* We appreciate the inclusion of “relocate approaches”, but without guidance, relocation/retreat could further inequities or be ignored due to implementation challenges, even when it may be the best option. The decision-making guide should include tools and offer peer-to-peer learning spaces to help jurisdictions navigate the diversity of property owners (and renters) along the Bayshore and negotiate among potentially conflicting needs. As one example, HOAs will be important stakeholders to engage with for subregional planning yet the RSAP does not mention these entities.
2. **Support low-resource jurisdictions through a phased planning process & project-based planners:** While the guidance document provides a robust framework for adaptation planning, it would be strengthened by offering clear strategies to ensure that smaller and under-resourced jurisdictions receive adequate support and are not left behind. Many wealthier jurisdictions have already adopted several of the Regional Shoreline Adaptation Plan (RSAP) priorities and continue to have greater financial and staff resources for adaptation. The stark inequities across our region are a shared challenge. We recommend that BCDC implement a phased planning process for subregions that have not yet advanced coordinated planning efforts. For phased planning, Year 1 could be establishing subregional collaboratives and governance. Year 2 could be focused on evaluating existing plans and planning efforts that could feed into the RSAP process, etc. BCDC could also support a regional grant application to fund project-based planners for low-resource jurisdictions or provide a trained planner for each subregion to coordinate and manage the Subregional planning process across jurisdictions.

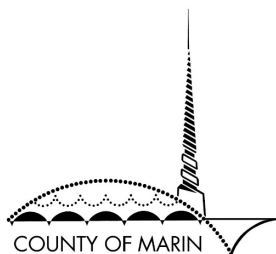
Thank you for your time and attention to this matter. We look forward to seeing how the Bay Conservation and Development Commission will address the public's concerns and refine the plan and future efforts to ensure regional collaboration on shoreline adaptation planning. Thank you for taking on this regional leadership role.

Sincerely,

Sarah Atkinson
Hazard Resilience Sr. Policy Manager | SPUR
satkinson@spur.org | www.spur.org

COMMENT #256

PDF - County of Marin



Derek Johnson
COUNTY EXECUTIVE

Daniel Eilerman
ASSISTANT COUNTY
EXECUTIVE

Ariel Espiritu Santo
ASSISTANT COUNTY
EXECUTIVE

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October 18, 2024

San Francisco Bay Conservation and Development Commission
Metro Center
375 Beale Street, Board Room
San Francisco, CA

RE: Public Comment on the Bay Plan Amendment No. 1-24 to Adopt a Regional Shoreline Adaptation Plan and Establish Guidelines for the Preparation of Sea Level Rise Plans Pursuant to SB 272 (Laird 2023)

Dear Bay Conservation and Development Commission,

The County of Marin is submitting public comment for the Bay Plan Amendment No. 1-24 to Adopt a Regional Shoreline Adaptation Plan and Establish Guidelines for the Preparation of Sea Level Rise Plans Pursuant to SB 272 (Laird 2023). The County of Marin agrees that collaborative action is needed to respond to sea level rise. In addition to the \$519,000 dollars allocated to Marin County's Sea Level Rise Governance Project, Marin's BayWAVE Initiative has invested approximately \$1 Million to identify multi-jurisdictional solutions to support Marin's response. The County's overall response has been substantive, with an estimated \$38M secured since 2009 to plan, design and construct flood and sea level rise protection projects and another \$77M in future investments planned.

After reviewing the Draft Regional Shoreline Adaptation Plan, Staff Report and Preliminary Recommendation, we respectfully ask the Bay Conservation and Development Commission (BCDC) to consider the following points:

- We request that all previous work for sea level rise, including but not limited to vulnerability assessments, climate adaptation plans or assessments, hazard mitigation plans, etc., be counted towards the requirements. The current draft guidelines state that previous work may be used, however they do not provide clear guidance on how existing plans will be evaluated, placing the burden on jurisdictions to ensure that they comply. We request that BCDC provide clear guidance and technical assistance to individual jurisdictions regarding which elements of the guidelines are not met by existing plans.
- We request that BCDC create a draft, all-inclusive Scope of Work with an estimated cost associated for local governments to use to understand the true magnitude of staff time and funding needed. A Scope of Work will help Local governments that have already adopted plans or have plans underway

to amend their current plans to fulfill guideline requirements. The estimated cost will help determine if identified funding sources are sufficient.

- The draft guidelines state that local governments must work with other regional transit and utility agencies, however, we have concerns about agency capacity to coordinate with all jurisdictions under the 2034 deadline.
- We have concerns about staff time required to fulfill these new planning requirements, while also moving forward urgent implementation projects to protect our community that have already been identified through previous planning efforts.

If you have any questions or would like to discuss any of the points outlined in this letter, please contact Ariel Espiritu Santo, Assistant County Executive at ariel.espiritusanto@marincounty.gov or 415.473.2408.

Respectfully submitted,



Derek Johnson
County Executive

CC: Ariel Espiritu Santo, Assistant County Executive
Marin County Board of Supervisors

COMMENT #257

PDF - San Francisco Estuary Institute

October 17, 2024

Ms. Jaclyn Perrin-Martinez
San Francisco Bay Conservation and Development Commission
375 Beale St
San Francisco, CA 94105
publiccomment@bcd.ca.gov

Subject: Comments on RSAP Draft for Public Comment (September 2024)

Dear Ms. Perrin-Martinez

Thank you for the opportunity to comment on the public draft RSAP. We appreciate the effort that BCDC and its staff have put into seeking input and incorporating feedback from a wide range of perspectives. The present draft reflects suggestions from community workshops, focus groups with local planners, meetings of a regional task force, and numerous meetings with interest groups and technical experts.

The San Francisco Estuary Institute is very supportive of the draft RSAP, particularly the strong emphasis on equity, ecological health and resilience, and nature-based shoreline adaptation. Our comments are based on improvements that we feel can be made to the draft to make it an even better document.

General comments

1. We recommend one or more advisory boards be established to monitor the plans, assess their contribution to Strategic Regional Priorities, and identify areas of conflict that may be stopping or slowing down the adaptation. These board could recommend adjustments to the plans if necessary and also policy and regulatory changes to address obstacles and tradeoffs related to adaptation. The advisory boards could include a mix of disciplines including members of Coastal Hazards Adaptation Resiliency Group (CHARG) and the San Francisco Bay Joint Venture (SFBJV).
2. How are the cumulative effects of the different plans accounted for? What is the mechanism for correcting the course after five or so years? What measures can be taken if significant new development is found in vulnerable areas in the region? This will increase the risk of flooding more people and assets while denying these areas future habitat adaptation.

Specific comments

3. (section 1.4.2, page 33). The box on page 33 should include a reference to a more detailed description of natural and nature-based adaptation and emphasize the value of natural habitats, such as marshes and mudflats. The San Francisco Bay Regional Water Quality Control Board's (RWQCB) Basin Plan, dated June 2024, provides detailed definitions and good examples of natural and nature-based adaptation.
4. (section 2.3.1, page 46). The guidance should reflect that Traditional Knowledge is one of the primary sources of scientific information for Best Available Science. Traditional Knowledge should be treated as equal to Western science.

2

5. (section 2.3.2. page 52). In the key for Figure 2-3, the labels for “Existing Estuarine-Upland Transition Zone” and “Eelgrass Suitability” should be edited to emphasize that these are restoration opportunities.
6. (section 2.3.2. page 52). Figure 2-3 should map undeveloped areas of the “Upper Boundary Estuarine-Upland Transition Zone” as restoration opportunities.
7. (section 2.3.2. page 53). The numerical habitat acreage goals from the SFBJV’s Implementation Plan should be included in the text to complement Figure 2-3.
8. (section 3.1.1, section 3.1.2, and others). Please consider adding to the term “landscape” (planning, considerations, assessment) throughout the document and include adjacent “shorelines, aquatic areas, nearshore areas” in this context. In the past there has been a lack of attention to aquatic areas and shorelines.
9. (section 3.1.1. Page 84). In Element A2a include a minimum distance of subtidal area that should be included in the plan area, such as a minimum of 100 feet from the mean lower low water shoreline edge.
10. (section 3.1.7. page 124). In Element G, EcoAtlas should be specified as the regional database of plans and projects. This is an important tool for tracking and comparing habitat metrics with regional goals.
11. (section 3.1.7. page 124). Language in Element G1, “Project List,” needs to be tightened. Is this a list of actual projects or a list of adaptation strategies? “Strategy” and “project” seem to be used interchangeably and should be better defined.

Thank you very much for reviewing our comments. We would be happy to talk more specifically about any of our input.

Sincerely,

Jeremy Lowe

Jeremy Lowe, Senior Scientist

COMMENT #258

PDF – The Watershed Project



October 18, 2024

Jaclyn Perrin-Martinez, Senior Climate Adaptation Planner
San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105

Submitted via email to: publiccomment@bcdc.ca.gov

RE: The Watershed Project Comments on the Regional Shoreline Adaptation Plan (RSAP)

Dear Jackie,

On behalf of The Watershed Project, congratulations on the completion of this well-crafted guideline document, which serves as a critical tool in strengthening the resilience of our cities and communities against the urgent risks posed by sea level rise. We appreciate the opportunity to review and provide our feedback on this important work. We look forward to working with BCDC, community members and partners, and local jurisdictions across the region to support the successful implementation of the RSAP.

Comments:

Equity

The Equity Assessment Standard is robust and thoughtfully addresses many facets of this important topic. However, we have a concern regarding the balance between allowing municipalities the flexibility to plan their own community engagement efforts and the need for oversight to ensure they are effective. There is a risk that some municipalities may not execute thorough community outreach or equity work, and it can be challenging to qualitatively assess the quality of their efforts, particularly whether they have engaged qualified professionals to lead this work



Cost Benefit

While the topic of cost-benefit analysis is sensitive and often faces significant pushback, it is essential to include a comparison of project costs versus the costs of inaction. This analysis is particularly important for environmental justice communities, as there is a finite pool of funding. Directing resources toward shoreline adaptation can limit the funds available for critical areas like education, public safety, and health. On a broader scale, this also means potentially diverting attention and resources away from climate mitigation efforts.

Additionally, the term 'managed retreat' should not be seen negatively. Its benefits should be emphasized, particularly when framed as giving space back to nature, which can lead to more sustainable and long-term resilience solutions.

Climate Mitigation

Regrettably, the guidelines do not address climate mitigation directly. While there is a preference for nature-based solutions, it is imperative that we explicitly include the desire to leverage these development opportunities to incorporate climate mitigation strategies. This could involve using highly carbon-sequester plants and ecosystems, adopting greener building materials with carbon-smart life cycles and low albedo, and ensuring that the structures we build contribute to reducing global warming throughout their development and implementation phases.

Cohesiveness

It is crucial to ensure that sea level rise adaptation plans are cohesive and align seamlessly with other regional development plans, including transportation, housing, and economic growth strategies. This alignment will help create a more integrated approach to regional development, maximizing the benefits of adaptation efforts while supporting broader goals for sustainable growth and resilience.

Maintenance

Shoreline adaptation plans must include a clear and comprehensive long-term maintenance strategy. It is essential to ensure that these projects remain effective and



resilient over time, with dedicated resources and planning in place for their ongoing upkeep and adaptation to changing conditions.

Financing

We are concerned that the RSAP may trigger competition between jurisdictions over funding for both planning and the subsequent implementation and maintenance phases. Municipalities are already overburdened, understaffed, and overwhelmed. The guidelines must provide clear, secured pathways for funding. It is unrealistic to expect cities and counties to engage in the costly and time-consuming process of competitive grant writing, which often results in disappointment. There needs to be a well-organized, dedicated federal or state funding mechanism to support these critical efforts.

We appreciate this opportunity to work with you on RSAP and look forward to seeing the final plan.

Best Regards

Two handwritten signatures in black ink. The first signature is 'Naama Raz Yaseef' and the second is 'Juliana Gonzales'. Both are written in a cursive, flowing style.

Naama Raz-Yaseef and Juliana Gonzales
The Watershed Project

COMMENT #259

PDF - San Francisco Bay Shoreline Contamination Cleanup Coalition

October 18, 2024

San Francisco Bay Conservation and Development Commission
375 Beale Street
San Francisco, CA 94105



Submitted via email to: publiccomment@bcdc.ca.gov

Re: Draft Regional Shoreline Adaptation Plan (RSAP)– SFBSCCC Public Comment
Comments to San Francisco Bay Development Commission on the Draft Regional Shoreline Adaptation Plan (hereafter referenced as "RSAP")

Submitted by the [San Francisco Bay Shoreline Contamination Cleanup Coalition](#)

To Whom It May Concern at the SF Bay Conservation Development Commission:

The San Francisco Bay Shoreline Contamination Cleanup Coalition submits these comments on behalf of its 18 member organizations:

350 SF All Things Bayview Bayview Hunters Point Mothers & Fathers Committee
Breathe Citizens for East Shore Parks (CESP) Climate Reality Project Bay Area Chapter
Climate Resilient Communities Extinction Rebellion SF Bay Area Youth Vs Apocalypse
Greenaction for Health & Environmental Justice Marie Harrison Community Foundation
Marin City Climate Resilience & Health Justice Our City SF Rise South City
Richmond Shoreline Alliance SF Baykeeper Sunflower Alliance
West Oakland Environmental Indicators Project

The San Francisco Bay Shoreline Contamination Cleanup Coalition mobilizes for the safe, comprehensive, and immediate cleanup of all toxic and radioactive contamination near the SF Bay shoreline, where sea level rise (SLR) due to climate change will spread the contamination. Environmental and climate justice is our highest priority.

While we are impressed in many ways with the intention and collective approach in the RSAP, our assessment is that it can be made much stronger with the following enhancements and changes.

Comment 1 – The RSAP must adopt stronger standards than the Ocean Protection Council (OPC) 2024 State Sea Level Rise Guidance by following worst-case scenario "High" Sea Level Rise (SLR) projections, which the current Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (AR6) describes as "less likely".

Currently, the OPC Guidance assumes a worst case of up to 10 feet (3 meters) SLR by 2130, roughly half the 6-meter rise we know may have occurred in past eras. **We strongly urge that the RSAP go beyond OPC recommendations and adopt a much stronger and solidly Precautionary Principle-based standard for a worst-case SLR of 5 meters within the next 100 years.**

The OPC Guidance establishes its "best available science" standard by ignoring and dropping out the most precautionary studies in the latest IPCC AR6 report, which projects as much as 5 meters (16.4 feet) by 2150.¹ Ignoring these "less likely" scenarios simply does not make sense in light of the fact that the IPCC, because it is so large and has to synthesize the work of thousands of scientists into one report, is by its nature overly cautious. In past reports, it has consistently underestimated worst-case scenario projections.²

The RSAP relies on the OPC Guidance and “requires adaptation strategies to be developed at a conceptual level and respond to vulnerabilities identified by, at a minimum, the 0.8 ft (2050 Intermediate) and 3.1 ft (2100 Intermediate) scenarios. A narrative description of how adaptation strategies identified in the 3.1 ft (2100 Intermediate) scenario may need to further adapt for flood risk reduction in the 6.6 ft (2100 High) scenario is also required [RSAP, pg 130].” These requirements are too low to adequately protect future generations. Sea level and groundwater will continue to rise, and climate change will strengthen storm surges. We need to ensure our shoreline adaptation plans are robust and remain protective through future climate changes.

Furthermore, some of the world's best climate scientists (most notably the team led by climate expert James Hansen, the NASA scientist who established the modern foundational approach to climate science) have not only recently reinforced IPCC's "less likely" 5-meter scenario, but have even stated that such a scenario may play out much sooner. Hansen's team has recently published a series of peer reviewed studies which project SLR of "several meters over a timescale of 50–150 years".^{3 4}

¹IPCC Sixth Assessment Report (AR6) Release of WG1 Report: The Physical Science Basis of Climate Change, <https://iccinet.org/ipcc-sixth-assessment-report-ar6-release-of-wg1-report-the-physical-science-basis-of-climate-change>

²Scientific American, How the IPCC Underestimated Climate Change, 2021
<https://scientificamerican.com/article/how-the-ipcc-underestimated-climate-change>

³Hansen, J., et al., Ice melt, sea level rise and superstorms: evidence from paleoclimate data, climate modeling, and modern observations that 2 °C global warming could be dangerous, Atmos. Chem. Phys., 16, 3761–3812, 2016
<https://doi.org/10.5194/acp-16-3761-2016>

⁴Hansen, J., et al., Global warming in the pipeline, Oxford Open Climate Change, Volume 3, Issue 1, 2023
<https://academic.oup.com/oocc/article/3/1/kgad008/7335889>

The Hansen team's work has been validated by other researchers who have studied rapid SLR events in geological pre-history, and have shown that the sea level has previously risen at a rate of up to 6 meters per century. In the most recent of these studies, the Durham University Department of Geography examined a "Meltwater Pulse" event 14,650 years ago. The Durham study has a long array of different projections, but its worst-case scenario is noted on the last paragraph of page 3 and establishes that the SLR for that event ranged from "13.6–30.9 meters for a 500-year duration," with the high end—30.9 meters—being a little over 6 meters per century.⁵

Furthermore, standard engineering practice for construction and other projects involving highly variable factors such as hazardous contaminants, and sea level and groundwater rise, employs factors of safety that assume projected dangers to potentially be at least 100% greater than expected. The Plan should require projects, cleanup, and hazard mitigation impacted by sea level and groundwater rise to likewise assume this 100% factor (e.g., in a location where a 3-meter SLR is projected, a 6-meter potential danger should be assumed).

We strongly urge that the RSAP assume at least 5 meters per century in its worst-case SLR projections and adopt a 100% margin of error as the *standard* assumptions for all shoreline adaptation plans.

Comment 2 – The RSAP must specifically define a more robust proper clean up standard that fits 21st century realities, and must not allow waste to be capped or otherwise contained in light of unprecedented dangers posed by sea and groundwater rise.

In [Appendix D-1-6, page 18 \(PDF page 652\) of the SF Waterfront Coastal Flood Study \(2024\)](#) the US Army Corps of Engineers (USACE) states:

"Many existing regulations and remediation methods do not yet consider climate change. As sea levels rise and shallow groundwater tables rise, contaminated sites in low-lying nearshore areas could be exposed to sea level rise–driven flood hazards and higher groundwater tables that exceed the original remediation design conditions. In areas of Bay fill and sandy soils, higher groundwater tables can also increase the liquefaction risk in response to seismic events. These changing hazards could create unintended human health and environmental exposure pathways."

Due to these impending circumstances, the RSAP must explicitly list the remediation methods that must no longer be used at sites subject to sea level and groundwater rise. This list should explicitly reject capping, containment, institutional controls, or other remediation

⁵Lin, Y., Hibbert, F.D., Whitehouse, P.L. et al., A reconciled solution of Meltwater Pulse 1A sources using sea-level fingerprinting. Nature Communications 12, Article #2015 (2021), pg 3, par 4
<https://doi.org/10.1038/s41467-021-21990-y>

methods that involve leaving hazardous waste in place. These methods of remediation cannot be used on sites along or near the shoreline due to threats from sea and groundwater rise. Caps clearly do not protect against groundwater rise, as it upwells from below the surface. Moreover, caps and other containment remedies cannot be properly examined, repaired, or replaced if they are eventually inundated by sea water.

In light of these modern, far more uncertain and unstable conditions, so-called "institutional controls" which seek to limit exposure to contaminants through already questionable methods (e.g. prohibiting residents and businesses from growing food, allowing children and pets to play in yards and soil) are no longer advisable. Hazardous contaminants must be fully cleaned up. To achieve this for contaminated residential and commercial sites subject to sea level and groundwater rise, it makes sense to adopt the Residential "Single Family Housing" cleanup standard that would render sites clean enough to support in-the-ground food gardens.

Furthermore, where existing onsite contaminants are currently capped, contained, and/or institutionally controlled, caps and containment must be required to be removed and the contaminants fully remediated to the Single Family Housing standard in all soils where hazard mitigation is deemed necessary, or where project sites are developed.

Comment 3 – The Guidelines for the Subregional Shoreline Adaptation Plans need to include further requirements on shoreline contamination and cleanup standards

Shoreline contamination, including areas of the shoreline remediated through methods that leave hazardous waste in place, must be included in multiple elements of the Subregional Shoreline Adaptation Plan (SSAP).

Element B, which “identifies and describes local existing conditions that form the context for planning,” could be made stronger by adding more specifications regarding contamination cleanup. Element B1 requires the SSAP to list “existing plans, studies, regulatory codes, and/ or other information that may be relevant to addressing and responding to coastal flooding hazards” but doesn’t explicitly include contamination cleanup, remediation plans, or vulnerability assessments as required to list and describe. Understanding and incorporating historical, current, and planned remediation/cleanup plans helps in assessing the risk of mobilized contamination and identifying where contamination may be capped or contained. Some of this information may overlap with the requirements of the Equity Assessment, but cleanup-specific plans, reports, and documents should be included as they are extremely relevant in addressing and responding to coastal hazards. Shoreline contamination is addressed in element B4 as it is required to map and describe contaminated sites, landfills, and Superfund sites, but this element only *recommends* addressing brownfield sites, buildings and/or land use that contain hazardous materials, and oil spill risks. **We urge that all of these forms of shoreline contamination be required to be mapped and described in the SSAPs.** The Strategic Regional Priority driving this element is

“Reduced Contamination and Environmental Justice” when, in order to be protective of human health and the environment, it should be “*Clean Communities* and Environmental Justice”. This basis may be why some aspects of the SSAP elements do not fully address the risks associated with sea water or groundwater coming in contact with contamination that has been left in place along the shoreline.

Element C requires a vulnerability assessment for “areas of significance.” One of the criteria to be identified as an area of significance is “Exposure to the 0.8 ft scenario”, which is the minimum projection used for 2050. **We urge the criteria to expand to *at least the 2100 projection used in the RSAP of 6.6ft.*** This is important because it will help ensure stronger protections, more robust plans, and timely action. This requirement aims to prioritize action for adaptation in specific areas that may be affected by sea level rise and groundwater rise, but since the SSAPs are not due until 2034, a planning window only to 2050 does not project far enough into the future.

Comment 4 – Impacted communities, especially frontline communities facing the most serious environmental justice harms posed by SLR and climate disruption, must have their current and historical demands recognized and be included in decision making, and the RSAP (and SSAPs) must establish actual methods and tools for this inclusion, and for environmental, social, and economic action to address impacts.

The RSAP includes multiple sections that highlight the importance of community input and multiple perspectives, but it lacks cleanup standards communities have been demanding for decades. Local, regional, state and federal agencies in California have a long history of failing to protect our most vulnerable communities by not following through on their missions or commitments to these communities. Communities living on or next to toxic waste sites for years and even decades are particularly overdue for justice.

There is an astonishing requirement in the RSAP on page 148, Item 11, that Environmental Justice communities should demonstrate and describe how remediation of contaminated sites is being prioritized and coordinated with national and state regulatory agencies. This statement ignores the fact that policies followed by these agencies (in the face of community opposition and even legal action) have resulted in hundreds of shoreline contaminated sites that are vulnerable to sea level rise. The vast majority of these sites have contamination either left in place or are open pits filled with contaminated materials. A "cap" is placed over the top, but the sides and bottoms of capped sites are not sealed in any way.

The cap prevents direct contact with contaminated soil, but the threat comes from underneath, in the form of sea level rise and non-emergent shallow groundwater that is pushed upward as sea levels rise. As groundwater encounters the contaminants in capped sites, mobilized toxins can be transported offshore or can move in unanticipated ways, creating plumes of contaminated

groundwater that carry the toxins beneath nearby neighborhoods. **We believe the most *pressing* concern is exposure to volatile organic compounds (VOCs) via vapor intrusion through unmaintained infrastructure.**

Members of EJ communities have worked with, pleaded, negotiated, organized, educated, litigated, and demonstrated to regulatory agencies for decades that capped sites represent a threat to their communities and a threat to San Francisco Bay. The agencies have responded by largely ignoring community input and allowing poor site conditions and development plans to proceed without the needed changes insisted on by communities.

The draft RSAP requires EJ communities to "demonstrate and describe where and how remediation is being prioritized and what coordination is occurring with the responsible parties and regulatory agencies." This directive implies that the agencies' lack of attention to sea level rise (and creation of capped shoreline contamination sites) is somehow due to lack of coordination on the part of the EJ communities themselves.

The Plan should describe what mechanisms (including changes in law) can be accessed and used to enable residents and workers impacted by SLR to have *direct legal representation* and a seat at the table in the decision-making process for impacted communities, sites and/or projects.

Comment 5 – Please consult our public comments (also attached) on other sea level rise and climate disruption planning documents and agencies you have cited and/or will be impacted by the RSAP, especially our recent comments on the San Francisco Waterfront Coastal Flood Study - Draft Plan

Attached are our related public comments on:

- ❖ **DTSC: Sea Level Rise Guidance to DTSC Project Managers for Cleanup Activities 2023**
- ❖ **OPC: State of California Sea Level Rise Guidance: 2024 Science and Policy Update**
- ❖ **SF Port: San Francisco Waterfront Flood Study – Draft Plan (2024)**
- ❖ **City & County of San Francisco: 2025 Hazards and Climate Resilience Plan**

NOTE: Our comments on the San Francisco Port Waterfront Flood Study are particularly important because they highlight how an improved RSAP might better guide local decision making. Our comments point out some key problems in a specific municipal draft plan prepared by the SF Port and the United States Army Corps of Engineers.

Closing Statement

The San Francisco Bay Shoreline Contamination Cleanup Coalition (SFBSCCC) is pleased to see that this Draft Regional Shoreline Adaptation Plan emphasizes the need for collaboration and action to address threats to our shoreline communities, ecosystems, and habitats.

Our coalition is predominantly composed of frontline community organizations, all concerned about the health and safety of our communities and surrounding environments. As a coalition, we are most concerned about our most disadvantaged communities, which are disproportionately exposed to environmental contamination and toxic sites due to discrimination such as redlining, environmental racism, and classism. We feel particularly strongly that exposure to toxic and radioactive waste, as well as the capping of contamination on the shoreline where housing is planned, is dangerous, unjust and further threatens already disadvantaged communities.

Thank you for your attention to these important concerns.

San Francisco Bay Shoreline Contamination Cleanup Coalition

<https://sfbayshorelineccc.org>

Contact:

Skylar Sacoolas, Co-coordinator, SFBSCCC

skylar@greenaction.org 415-447-3904

Eric Brooks, Co-Coordinator, Policy & Advocacy

brookse32@sonic.net 415-756-8844

COMMENT #260

PDF - Greenaction for Health and Environmental Justice



October 18, 2024

San Francisco Bay Conservation and Development Commission
375 Beale Street
San Francisco, CA 94105

Submitted via email to: publiccomment@bcdca.gov

Re: Draft Regional Shoreline Adaptation Plan (RSAP)– Greenaction’s Public Comment

Greenaction for Health and Environmental Justice submits these comments on the Draft Regional Shoreline Adaptation Plan [hereafter: The RSAP] on behalf of our members and supporters living along the San Francisco Bay shoreline, with a focus on those living in the Bayview Hunters Point community. We are grateful for the RSAPs vision and goals of a unified approach to shoreline adaptation and highlighting the need for collective action. The groundwater, tides, and storms don’t follow jurisdictional boundaries. San Francisco’s current shoreline adaptation plans are not unified, leaving areas of the shoreline like Bayview Hunters Point, vulnerable to dangerously disproportionate impacts.

Comment 1 – The RSAP must specifically define a more robust clean up standard and must not allow waste to be capped or contained in light of unprecedented dangers posed by sea and groundwater rise.

The RSAP must explicitly list certain remediation methods that must no longer be used at sites subject to sea and groundwater rise. This list should explicitly reject capping, containment, institutional controls, or other remediation methods that involve leaving hazardous or toxic waste in place. These methods of remediation cannot be used on sites along or near the shoreline due to threats from sea and groundwater rise mobilizing contamination. Caps clearly do not protect against groundwater rise as it upwells from below the surface. And caps and other containment remedies cannot be properly examined, repaired, or replaced if they are eventually inundated by sea water. Remediation at the Hunters Point Naval Shipyard Superfund Site utilized ubiquitous land covers where toxic contamination is buried at this site that is located directly on the Southeast shoreline of San Francisco. A radioactive glass shard was discovered at the site, in 2023, in a portion of the shipyard the Navy assured “*no radiological contamination remains*” highlighting the urgent need for extensive retesting, revised cleanup plans, and diligent oversight.

San Francisco’s Waterfront Flood Study, led by the Port of San Francisco, does not include protections for the shoreline below Heron Head’s Park (which includes the Hunters Point Naval Shipyard), so the city relies on the Navy to remediate and protect the Bayview Hunters Point community from sea level rise and groundwater rise at the Shipyard. Relying on the Navy to prepare the shoreline of the Shipyard Superfund Site is irresponsible and a poor excuse for not addressing this portion of the shipyard. The Navy cannot be trusted to protect the community or surrounding environment from projected harm due to their historical and current negligence in their responsibility to clean up the Shipyard Superfund site. How can the RSAP *ensure*, not just incentivize, that communities won’t be left behind? We cannot rely on caps and containment to protect future generations and the environment from mobilized contamination and increased exposure pathways.

Furthermore, where *existing* on-site contaminants are currently capped, contained, and/or institutionally controlled, caps and containment must be required to be removed or treated and the contaminants fully cleaned up to the Single Family Housing standard in all soils where hazard mitigation is deemed necessary, or project sites are developed.

Comment 2: All SSAPs should be preparing for, at minimum, the worst case scenario outlined in the RSAP: MHHW+3.5ft+6.6ft

The RSAP relies on the OPC Guidance and “requires adaptation strategies to be developed at a conceptual level and respond to vulnerabilities identified by, at a minimum, the 0.8 ft (2050 Intermediate) and 3.1 ft (2100 Intermediate) scenarios. A narrative description of how adaptation strategies identified in the 3.1 ft (2100 Intermediate) scenario may need to further adapt for flood

risk reduction in the 6.6 ft (2100 High) scenario is also required [RSAP, pg 130].” These requirements are too low to adequately protect future generations. Sea level and groundwater will *continue to rise*, and climate change will strengthen storm surges. We need to ensure our shoreline adaptation plans are

Sea Level Rise Scenarios	Minimum Coastal Flood Hazards				Required Elements	
	Tidal Inundation (MHHW)	Storm Surge (100-year)	Shallow Groundwater	Groundwater Emergence/Flooding	Element C: Vulnerability Assessment**	Element D: Adaptation Strategies and Pathways**
0.8 ft (2050)	MHHW + 0.8 ft	MHHW + 3.5 ft + 0.8 ft	Depth to groundwater for 0.8 ft of sea level rise	Groundwater that has reached the surface for 0.8 ft of sea level rise	✓	✓
3.1 ft (2100 Intermediate)	MHHW + 3.1 ft	MHHW + 3.5 ft + 3.1 ft	Depth to groundwater for 3.1 ft of sea level rise	Groundwater that has reached the surface for 3.1 ft of sea level rise	✓	✓
4.9 ft (2100 Intermediate-High)	MHHW + 4.9 ft	MHHW + 3.5 ft + 4.9 ft	Depth to groundwater for 4.9 ft of sea level rise	Groundwater that has reached the surface for 4.9 ft of sea level rise	✓	
6.6 ft (2100 High)	MHHW + 6.6 ft	MHHW + 3.5 ft + 6.6 ft	Depth to groundwater for 6.6 ft of sea level rise	Groundwater that has reached the surface for 6.6 ft of sea level rise	✓	✓*

Table 3—1. Combined Coastal Flood Hazard and Sea Level Rise Requirements.
 **Assets with a check mark (✓) indicate that the sea level rise scenario and the associated minimum coastal flood hazards are required in the respective element of the Subregional Shoreline Adaptation Plan Guidelines. Assets with an asterisk check mark (✓*) means that a narrative description of this sea level rise scenario is required.

robust and remain protective through future climate changes. All SSAPs should be adapting and preparing for the worst case scenario outlined by the “Minimum Coastal Hazards” table: MHHW+3.5ft+6.6ft.

Comment 3 – The Guidelines for the Subregional Shoreline Adaptation Plans (SSAPs) need to include further requirements on shoreline contamination and cleanup standards

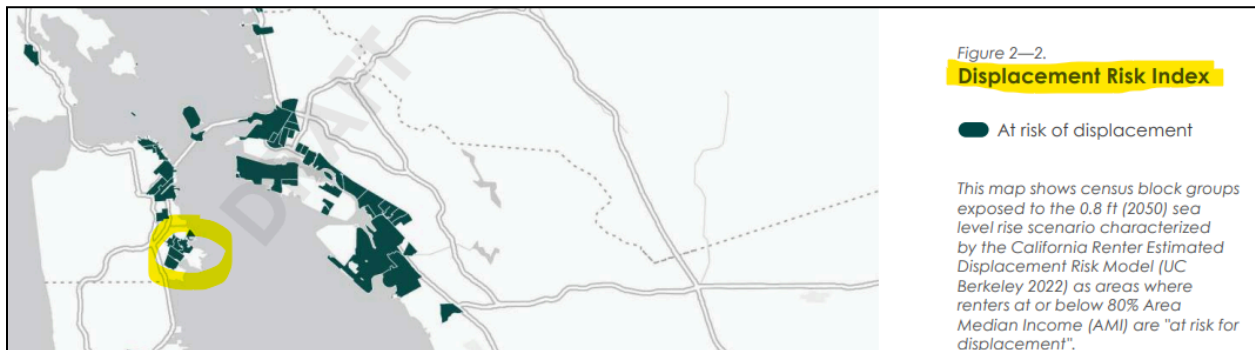
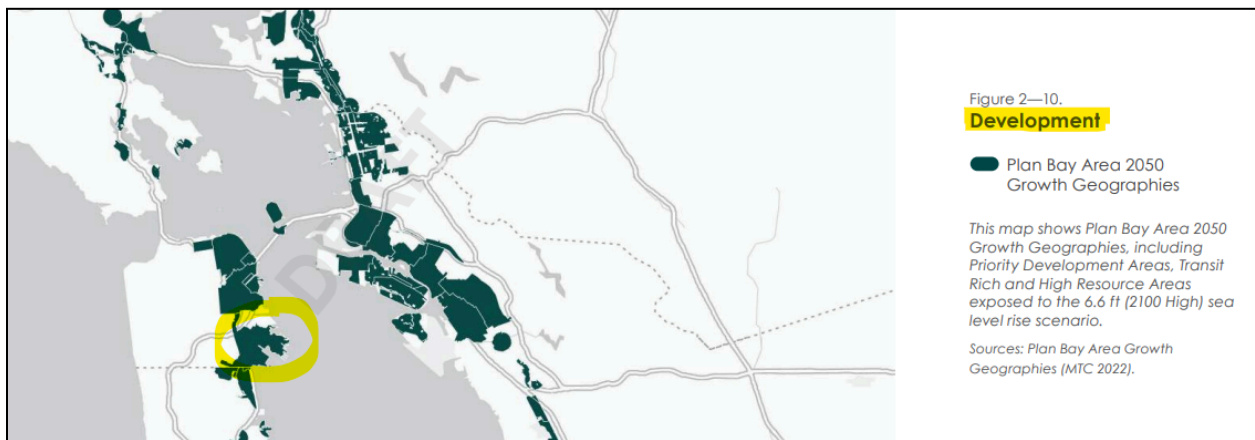
Shoreline contamination, including areas of the shoreline remediated through methods that leave waste in place, must be included in multiple elements of the Subregional Shoreline Adaptation Plan (SSAP). The SSAPs should include stronger cleanup standards and requirements and explicitly identify capped or contained waste and address the vulnerabilities they have to degradation, sea level rise, groundwater rise, and permanent inundation.

Element B “identifies and describes local existing conditions that form the context for planning” and could be stronger by adding some more specifications regarding contamination cleanup. Element B1 requires the SSAP to list “existing plans, studies, regulatory codes, and/ or other information that may be relevant to addressing and responding to coastal flooding hazards” but doesn’t explicitly include contamination cleanup, remediation plans, or vulnerability assessments as required to list and describe. Understanding and incorporating historical, current, and planned remediation/cleanup plans help in assessing the risk of mobilized contamination and identifying where contamination may be capped or contained. Some of this information may overlap with the requirements of the Equity Assessment, but cleanup specific plans, reports, and documents should be included as it is extremely relevant in addressing and responding to coastal hazards. Shoreline contamination is addressed in element B4 as it is required to map and describe contaminated sites, landfills, and superfund sites but only *recommends* to address brownfield sites, buildings and/or land use that contain hazardous materials, and oil spill risks. We urge that all of these forms of shoreline contamination be *required* to map and describe in the SSAPs. The Strategic Regional Priority driving this element is “Reduced Contamination and Environmental Justice” when, in order to be protecting human health and the environment, it should be “*Clean Communities* and Environmental Justice”. This basis may be why some aspects of the SSAP elements are weak to the risks associated with sea water or groundwater coming in contact with contamination that has been left in place along the shoreline.

Element C requires a vulnerability assessment for “areas of significance”. One of the criteria to be identified as an area of significance is “Exposure to the 0.8 ft scenario”, which is the minimum projection used for 2050. We urge the criteria to expand to *at least* the 2100 projection used in the RSAP of MHHW+3.5ft+6.6ft. This is important because it will help ensure stronger protections, more robust plans, and timely action. This step aims to prioritize action for adaptation in specific areas that may be affected by sea level rise and groundwater rise but since the SSAPs aren’t due until 2034, only planning to 2050 is not far enough out.

Comment 4 – Without proper cleanup the Hunters Point Naval Shipyard Superfund Site cannot be highlighted as an area for “safe and strategic shoreline growth and density”

As stated above, proper remediation of the Hunters Point Naval Shipyard Superfund Site is of the utmost importance and is urgently needed to better protect the community of Bayview Hunters Point from environmental contamination and pollution. The Navy continues to fail to revise their cleanup plans to exclude leaving waste in place. As seen in the screenshots below, the RSAPs One Bay Vision highlights the entire Shipyard Superfund Site and the surrounding Bayview Hunters Point (BVHP) community as ‘growth geographies’. The BVHP community has historically been displaced, with new luxury developments continuing to move in. Protecting the health, security, and culture of the community by cleaning up contamination, combatting displacement, and caring for the *current and historical* residents should be at the forefront; not *new* developments that do not benefit the existing communities. .



Comment 5- The RSAP needs to have more enforcement authority in order to ensure timely, robust, and collective action

Listening to the discussion between commissioners at the October 17th hearing highlighted some weaknesses in the authority of the RSAP. If the Bay Conservation and Development Commission (BCDC) are unable to deny a permits based on inadequacies in a City, County, or areas SSAPs; *What power does the RSAP(or subsequent SSAPs) have?* Several Commissioners raised concerns over the regulatory power this document actually has, aka its ‘teeth’. The RSAP acknowledges

the urgent threat and need for collective action and has taken the first strides toward a unified approach, but as of now, it seems to be more of a 'vision' for the Bay Area than an enforceable policy. We need more than incentives and a vision to act urgently, collectively, and safely.

Closing Statement

The overall goals and priorities of the RSAP is what the Bay Area needs to collectively protect shoreline communities from sea level rise, groundwater rise, and other climate hazards. We need a unified approach so no community is left behind! Climate change and the oceans tides will not follow jurisdictional boundaries, like city or county lines. We hope to see this plan grow stronger and assist in the creation of robust, protective, and expansive shoreline adaptation plans.

Thank you for your attention to these important concerns.

**For environmental justice,
Greenaction for Health and Environmental Justice**

Contact: Skylar Sacoolas, Environmental Justice Organizer, skylar@greenaction.org

COMMENTS #261-277

Comments submitted via Typeform

COMMENT #261

Peter Birkholz

birkholz@page-turnbull.com

9/17/2024 0:08:22

Introduction

The introduction of the Regional Shoreline Adaptation Plan covers the laws, policies, and concepts behind our shoreline planning approach.

If you have comments or suggestions about this section (1.1 -1.4), please share them here:

Section 1.3.3 - Related Laws and Policies: I think that the California Environmental Quality Act (CEQA) needs to be listed in this section. Won't the enactment and permitting still need CEQA review?

***The One Bay Vision and Strategic Regional Priorities ***

One Bay Vision and Strategic Regional Priorities section outlines the shared goals for successful adaptation planning in our region, identifies key issues and their spatial patterns, and details the necessary policy responses for local action. Developed through extensive collaboration, this section provides a comprehensive framework for our approach.

If you have comments or suggestions about this section (2.1 - 2.3), please share them here:

It is interesting that page 45 has an image of a historic san francisco pier, yet nowhere in this document is there any mention of cultural resources, the evaluation of impacts to such, and any discussion of the value of the existing built environment and the value of such.

General Comments

If you have any final thoughts or feedback about the document that you havent already covered in the survey, you can share them here. While we appreciate any additional input, please note that this section is for comments not addressed elsewhere.

If you don't have further feedback, there is no need to provide additional comments. Thank you for your participation!

The Port of SF and BCDC do not acknowledge or address what to do with existing waterfront properties in SF, in particular the historic piers. These should be explicitly mentioned and addressed in the future.

COMMENT #262

Kirstin Huiber

kirstin.huiber@acgov.org

9/19/2024 19:49:43

Introduction

The introduction of the Regional Shoreline Adaptation Plan covers the laws, policies, and concepts behind our shoreline planning approach.

If you have comments or suggestions about this section (1.1-1.4), please share them here:

"pluvial" and "fluvial" are too technical for many readers of this document. Either don't use them, or define them in parentheses after you use them for the first time ("water rise due to rain", "water rise due to river flooding"). Even I'm not sure whether "fluvial" refers to a whole watershed. Including a glossary might also be a good idea.

***The One Bay Vision and Strategic Regional Priorities ***

One Bay Vision and Strategic Regional Priorities section outlines the shared goals for successful adaptation planning in our region, identifies key issues and their spatial patterns, and details the necessary policy responses for local action. Developed through extensive collaboration, this section provides a comprehensive framework for our approach.

If you have comments or suggestions about this section (2.1 - 2.3), please share them here:

I'm still reading the rest of the document!

COMMENT #263

Judith Fruge

jgfruge@gmail.com

9/19/2024 21:05:40

***The Subregional Shoreline Adaptation Plan Guidelines ***

Tools to Support Plan Development (3.5)

The Tools to Support Plan Development section covers the resources to augment local capacity and reduce barriers to plan development.

If you have comments or suggestions about this section (3.5), please share them here:

Please take into consideration accessibility and accommodation for people with disabilities.

COMMENT #264

Milton Lau

twilightspecter@yahoo.com

9/20/2024 14:43:53

Introduction

The introduction of the Regional Shoreline Adaptation Plan covers the laws, policies, and concepts behind our shoreline planning approach.

If you have comments or suggestions about this section (1.1 -1.4), please share them here:

Why not install a lock and barrier (dam) at the (literally) Golden Gate. The piers of the bridge can reinforce the basis of the barrier dam. While a Lock would enable shipping and Navy vessels accessibility to the San Francisco Bay. Sea water pumps would effectively mitigate water levels of the bay water as needed when run off into the estuaries occur.

***The One Bay Vision and Strategic Regional Priorities ***

One Bay Vision and Strategic Regional Priorities section outlines the shared goals for successful adaptation planning in our region, identifies key issues and their spatial patterns, and details the necessary policy responses for local action. Developed through extensive collaboration, this section provides a comprehensive framework for our approach.

If you have comments or suggestions about this section (2.1 - 2.3), please share them here:

Why not create a barrier

***The Subregional Shoreline Adaptation Plan Guidelines ***

Subregional Plan Elements (3.1)

Subregional Plan Elements section contains plan requirements that local governments within BCDC's jurisdiction must meet when submitting Subregional Plans.

If you have comments or suggestions about this section (3.1), please share them here:

Building a barrier and lock for ships at the Golden Gate, may reduce the overall costs to real estate that may otherwise be sacrificed to build conventional seawalls along bay area shorelines. In fact by concentrating the effort at the Golden Gate barrier, could expedite construction proceedings and simplify the engineering elements of such an endeavor.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Minimum Standards (3.2)

Minimum Standards section covers the minimum standards required in the Subregional Plan Element requirements. These standards ensure consistent and effective adaptation planning across the region.

If you have comments or suggestions about this section (3.2), please share them here:

Pumping stations to expedite purging of bay water during rain event activity may be needed to maintain water levels inside the bay itself.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Complete Plan Submittal Checklist (3.3)

The Subregional Plans section covers the checklists that must be submitted to BCDC for review to

ensure consistency with the guidelines. Local governments are required to include checklists with their plan submission.

If you have comments or suggestions about this section (3.3), please share them here:

I may be contacted for further exploration of this concept if this agency is interested.

COMMENT #265

Linda Barbosa

hikerlindab@gmail.com

10/10/2024 3:15:16

Introduction

The introduction of the Regional Shoreline Adaptation Plan covers the laws, policies, and concepts behind our shoreline planning approach.

If you have comments or suggestions about this section (1.1 -1.4), please share them here:

This plan is a great step in preparing the bay for sea level rise. I would like to see nature based solutions as the first tool considered in each step. Solutions like levees and sea walls will not provide the long term changes that will be needed to protect the people, plants and animals of the bay.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Subregional Plan Elements (3.1)

Subregional Plan Elements section contains plan requirements that local governments within BCDC's jurisdiction must meet when submitting Subregional Plans.

If you have comments or suggestions about this section (3.1), please share them here:

We need a way to measure if actions are successful

***The Subregional Shoreline Adaptation Plan Guidelines ***

Plan Development, Submission, and Approvals Process (3.4)

The Plan Development, Submission, and Approvals Process section covers the planning responsibilities of the local governments, who are required to develop a plan, the roles of counties and cities, creating multijurisdictional plans, and the submittal and approval process.

If you have comments or suggestions about this section (3.4), please share them here:

Nature based solutions should be first on the list of options

***The Subregional Shoreline Adaptation Plan Guidelines ***

Tools to Support Plan Development (3.5)

The Tools to Support Plan Development section covers the resources to augment local capacity and reduce barriers to plan development.

If you have comments or suggestions about this section (3.5), please share them here:

How will progress be measured?

***The Subregional Shoreline Adaptation Plan Guidelines ***

Data Preview Comments

To support implementation of the RSAP, BCDC provides regionally available data layers to visualize existing conditions, map Strategic Regional Priorities, support vulnerability assessments and inform adaptation strategies and pathways.

If you have comments or suggestions about the draft data layers and analysis, please share them here:

Vulnerable communities need to be considered. Rising sea level has the potential to release dangerous chemicals.

General Comments

If you have any final thoughts or feedback about the document that you haven't already covered in the survey, you can share them here. While we appreciate any additional input, please note that this section is for comments not addressed elsewhere.

If you don't have further feedback, there is no need to provide additional comments. Thank you for your participation!

Thank you to all agencies and staff who have worked to create this plan. It is a thoughtful step in saving our bay.

COMMENT #266

Mei Collins
collins.meimei@gmail.com
10/11/2024 19:51:54

General Comments

If you have any final thoughts or feedback about the document that you haven't already covered in the survey, you can share them here. While we appreciate any additional input, please note that this section is for comments not addressed elsewhere.

If you don't have further feedback, there is no need to provide additional comments. Thank you for your participation!

Please require the public reporting of metrics to track adaptation action progress. A platform for transparently displaying the funding of projects would also be very helpful.

COMMENT #267

Alejandra Amador-Caro
aac20@berkeley.edu
10/15/2024 20:48:06

***The One Bay Vision and Strategic Regional Priorities ***

One Bay Vision and Strategic Regional Priorities section outlines the shared goals for successful adaptation planning in our region, identifies key issues and their spatial patterns, and details the necessary policy responses for local action. Developed through extensive collaboration, this section provides a comprehensive framework for our approach.

If you have comments or suggestions about this section (2.1 - 2.3), please share them here:

Transparency about metric used in comprehensive framework, and publicly available information on the "success" of specific approaches in current and future projects. Transparency is key.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Subregional Plan Elements (3.1)

Subregional Plan Elements section contains plan requirements that local governments within BCDC's jurisdiction must meet when submitting Subregional Plans.

If you have comments or suggestions about this section (3.1), please share them here:

Uniformity in expectations from respective local governments who accepted this collaboration. I understand BCDC does not have full purview to enact this into law but it would be interested for a rules of engagement guideline for what those expectations look like for the various local governments who have agreed to collaborate. Different local governments have different budgets for such projects so it is crucial that there is transparency in the change of tides of these potential projects.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Minimum Standards (3.2)

Minimum Standards section covers the minimum standards required in the Subregional Plan Element requirements. These standards ensure consistent and effective adaptation planning across the region.

If you have comments or suggestions about this section (3.2), please share them here:

Have a publicly available website that is logging the proposals for development and break down which minimum standards are included for respective projects to have a catalog of standards utilized in region specific projects.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Complete Plan Submittal Checklist (3.3)

The Subregional Plans section covers the checklists that must be submitted to BCDC for review to ensure consistency with the guidelines. Local governments are required to include checklists with their plan submission.

If you have comments or suggestions about this section (3.3), please share them here:

The checklists should give an option for a subject to change clause as new research emerges as projects are under construction to be able to iterate the design to include more robust design metrics, this goes

back to transparency and publicly available data. Understanding how a project is being scored is fundamentally in fostering public trust.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Plan Development, Submission, and Approvals Process (3.4)

The Plan Development, Submission, and Approvals Process section covers the planning responsibilities of the local governments, who are required to develop a plan, the roles of counties and cities, creating multijurisdictional plans, and the submittal and approval process.

If you have comments or suggestions about this section (3.4), please share them here:

Many developers will propose the least cost/effort based plan for the sake of cost savings, it is important to emphasize the opportunities that go beyond individual projects.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Tools to Support Plan Development (3.5)

The Tools to Support Plan Development section covers the resources to augment local capacity and reduce barriers to plan development.

If you have comments or suggestions about this section (3.5), please share them here:

Ensure transparency in financial capacity of certain jurisdictions to go beyond good faith and ensure equitable opportunities for development across the Bay.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Data Preview Comments

To support implementation of the RSAP, BCDC provides regionally available data layers to visualize existing conditions, map Strategic Regional Priorities, support vulnerability assessments and inform adaptation strategies and pathways.

If you have comments or suggestions about the draft data layers and analysis, please share them here:

Make sure this available data is made publicly available.

General Comments

If you have any final thoughts or feedback about the document that you haven't already covered in the survey, you can share them here. While we appreciate any additional input, please note that this section is for comments not addressed elsewhere.

If you don't have further feedback, there is no need to provide additional comments. Thank you for your participation!

You should use metrics that are visible to the public, transparency and visibility are my main comments.

COMMENT #268

Thomas Musial

thomasmusial@gmail.com

10/16/2024 4:58:29

Introduction

The introduction of the Regional Shoreline Adaptation Plan covers the laws, policies, and concepts behind our shoreline planning approach.

If you have comments or suggestions about this section (1.1 -1.4), please share them here:

I appreciate the emphasis on page 32-34 of the benefits of a water based ecosystem, and I hope to see this theme carry through the plan. I think something that should be emphasized in this plan is that these habitats should be not just maintained, but enhanced and increased. Nature-based Protect Solutions, like those highlighted in the graphic on page 30, are a great way to both preserve structures already in place while increasing the ecological, economic, and recreation benefits of a bayland habitat. I feel that the description of Protect Strategies should also include examples of nature-based solutions, rather than only examples of "hard" infrastructure, like seawalls and groundwater pumping.

***The One Bay Vision and Strategic Regional Priorities ***

One Bay Vision and Strategic Regional Priorities section outlines the shared goals for successful adaptation planning in our region, identifies key issues and their spatial patterns, and details the necessary policy responses for local action. Developed through extensive collaboration, this section provides a comprehensive framework for our approach.

If you have comments or suggestions about this section (2.1 - 2.3), please share them here:

I think section 2.3.2 is great! When the Bay is healthy, we all are healthy. I hope it is made clear that nature based solutions are expected to be used whenever possible, even if there are slight increases in cost, time to create, or other considerations. The benefits of nature-based solutions are significant, and it should be understood that they are to be the default plan, and that hard infrastructure will only be used when absolutely required. Nature based solutions will grow with the changing Bay while providing increased recreational and economic opportunities to her people - hard infrastructure will only turn the Bay into a bathtub.

COMMENT #269

Bruce Ohlson

bruceoleohlson@hotmail.com

10/17/2024 3:43:42

Introduction

The introduction of the Regional Shoreline Adaptation Plan covers the laws, policies, and concepts behind our shoreline planning approach.

If you have comments or suggestions about this section (1.1 -1.4), please share them here.

We must keep the Bay Alive. We do NOT want to line the Bay with boulders and create a dead bathtub.

***The One Bay Vision and Strategic Regional Priorities ***

One Bay Vision and Strategic Regional Priorities section outlines the shared goals for successful adaptation planning in our region, identifies key issues and their spatial patterns, and details the necessary policy responses for local action. Developed through extensive collaboration, this section provides a comprehensive framework for our approach.

If you have comments or suggestions about this section (2.1 - 2.3), please share them here.

We must plan for significant sea level rise because humans are not willing to reduce/eliminate the burning of fossil fuels.

General Comments

If you have any final thoughts or feedback about the document that you haven't already covered in the survey, you can share them here. While we appreciate any additional input, please note that this section is for comments not addressed elsewhere.

If you don't have further feedback, there is no need to provide additional comments. Thank you for your participation!

The Bay waters must be allowed to cover whatever land it needs to as the sea level rises. When the sea level rises and flows over Highway 37, allow it. Do NOT spend billions of dollars building a levee that raises this roadway.

COMMENT #270

Sivasankari Krishnanji
skrishnanji@gmail.com

10/17/2024 6:08:50

Introduction

The introduction of the Regional Shoreline Adaptation Plan covers the laws, policies, and concepts behind our shoreline planning approach.

If you have comments or suggestions about this section (1.1 -1.4), please share them here.

Using simpler language to explain the purpose and need of the RSAP would help.
The vision and goals would benefit from clearer, quantifiable targets to guide local efforts.

***The One Bay Vision and Strategic Regional Priorities ***

One Bay Vision and Strategic Regional Priorities section outlines the shared goals for successful adaptation planning in our region, identifies key issues and their spatial patterns, and details the necessary policy responses for local action. Developed through extensive collaboration, this section provides a comprehensive framework for our approach.

If you have comments or suggestions about this section (2.1 - 2.3), please share them here.

Quantifiable metrics: Specific, measurable objectives related to resilience, such as clearer environmental targets for reducing vulnerability to flooding or increasing the area of restored wetlands, as well as community engagement benchmarks would provide local governments with concrete goals to work towards and ways to assess progress.

Additional details for implementation strategies: Inclusion of more detailed action plans involving timelines and responsible parties for each SRP adaptation standard would be helpful. Adding a framework for monitoring and evaluating the effectiveness of the strategies would enhance accountability.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Subregional Plan Elements (3.1)

Subregional Plan Elements section contains plan requirements that local governments within BCDC's jurisdiction must meet when submitting Subregional Plans.

If you have comments or suggestions about this section (3.1), please share them here.

Providing pointers to funding sources such as state and federal grants, public-private partnerships and innovative financing options like resilience bonds could help local governments identify appropriate funding strategies.

Greater emphasis needs to be placed on natural and nature based solutions across plan elements since those are primarily what will enable adaptation pathways.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Minimum Standards (3.2)

Minimum Standards section covers the minimum standards required in the Subregional Plan Element requirements. These standards ensure consistent and effective adaptation planning across the region.

If you have comments or suggestions about this section (3.2), please share them here.

Please include a standard aimed at addressing the risks of rising sub-surface groundwater.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Complete Plan Submittal Checklist (3.3)

The Subregional Plans section covers the checklists that must be submitted to BCDC for review to ensure consistency with the guidelines. Local governments are required to include checklists with their plan submission.

If you have comments or suggestions about this section (3.3), please share them here.

There could be more items in the checklist that map to natural and nature based solutions, thereby ensuring local governments have given serious consideration to natural and nature based solutions.

COMMENT #271

Gail Napell
gailnapell@gmail.com
10/17/2024 16:18:56

***The One Bay Vision and Strategic Regional Priorities ***

One Bay Vision and Strategic Regional Priorities section outlines the shared goals for successful adaptation planning in our region, identifies key issues and their spatial patterns, and details the necessary policy responses for local action. Developed through extensive collaboration, this section provides a comprehensive framework for our approach.

If you have comments or suggestions about this section (2.1 - 2.3), please share them here.

This is a FABULOUS document. I do feel that there's a key element missing, which isn't really BDCD's jurisdiction but which you have gravitas and credibility to emphasize. This plan and all the plans created as part of it are VERY long term, and will take years to fund, execute and turn into physical reality. That's appropriate AND - we don't have nearly enough time for that. The solution isn't to change this plan, but to acknowledge this reality and require IMMEDIATE 'emergency' plans for all the communities that are already impacted. For example in my home city, San Rafael, the Canal District is already severely impacted in king tide / storm conditions, and we need an emergency plan to get everyone to temporary or even long term safe shelter and help the local businesses avoid failure in these events. We are so fortunate that with our local government has a resilience planner and supportive government to help make this happen. It's shown us that we need an IMMEDIATE solution as well as the long term one. (And unfortunately, as more residents realize that the pace of climate change is exceeding our preferred timelines for planning and adapting, i hear many people say we need a tidal gate or major sea wall as a solution, or assume that's the ONLY solution, even though our long-term plan for the area is still in process. Of course tidal gates and sea walls will be solutions or part of the solutions in some places, so will enhanced shorelines, managed retreat, etc. And hardened barriers will not benefit our shoreline ecosystem nor meet a key element of the RSAP.)

***The Subregional Shoreline Adaptation Plan Guidelines ***

Subregional Plan Elements (3.1)

Subregional Plan Elements section contains plan requirements that local governments within BDCD's jurisdiction must meet when submitting Subregional Plans.

If you have comments or suggestions about this section (3.1), please share them here.

Planning Process & Affected Communities should double down on including youth, as this group is universally impacted and also most likely to think outside the box. This includes children from the age of 8 and up. Ideally there could be a standard mandatory curriculum element on Regional Shoreline Adaptation for all Bay Area public schools as part of their science and social studies. This would help encourage parents to use public schools, spread the word from children to their families.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Minimum Standards (3.2)

Minimum Standards section covers the minimum standards required in the Subregional Plan Element requirements. These standards ensure consistent and effective adaptation planning across the region.

If you have comments or suggestions about this section (3.2), please share them here.

See prior note about public school engagement

***The Subregional Shoreline Adaptation Plan Guidelines ***

Complete Plan Submittal Checklist (3.3)

The Subregional Plans section covers the checklists that must be submitted to BCDC for review to ensure consistency with the guidelines. Local governments are required to include checklists with their plan submission.

If you have comments or suggestions about this section (3.3), please share them here.

See prior comment about public school engagement

***The Subregional Shoreline Adaptation Plan Guidelines ***

Plan Development, Submission, and Approvals Process (3.4)

The Plan Development, Submission, and Approvals Process section covers the planning responsibilities of the local governments, who are required to develop a plan, the roles of counties and cities, creating multijurisdictional plans, and the submittal and approval process.

If you have comments or suggestions about this section (3.4), please share them here.

See prior note about youth engagement

***The Subregional Shoreline Adaptation Plan Guidelines ***

Tools to Support Plan Development (3.5)

The Tools to Support Plan Development section covers the resources to augment local capacity and reduce barriers to plan development.

If you have comments or suggestions about this section (3.5), please share them here.

Re: youth engagement, could BCDC work with public school districts / an org like Y-PLAN to develop a standard curriculum? There are many people who will volunteer to assist with this (including actually teaching in the classroom) from retired people like me to older students in high school and college

***The Subregional Shoreline Adaptation Plan Guidelines ***

Data Preview Comments

To support implementation of the RSAP, BCDC provides regionally available data layers to visualize existing conditions, map Strategic Regional Priorities, support vulnerability assessments and inform adaptation strategies and pathways.

If you have comments or suggestions about the draft data layers and analysis, please share them here.

LOVE THESE RESOURCES! I have colleagues in other parts of the state / country / world who are quite envious of our data resources

***The Subregional Shoreline Adaptation Plan Guidelines ***

Bay Plan Amendment No. 1-24

BCDC Staff provided Preliminary Recommendations to the Commission on Bay Plan Amendment No. 1-24 in the Staff Report.

If you have comments about the Staff Report and Bay Plan Amendment No. 1-24, please share them here.

Could not find this document on the website

General Comments

If you have any final thoughts or feedback about the document that you haven't already covered in the survey, you can share them here. While we appreciate any additional input, please note that this section is for comments not addressed elsewhere.

If you don't have further feedback, there is no need to provide additional comments. Thank you for your participation!

Thank you so much for this amazing document, all the work that went into it and all the work it will help guide. Please see prior comment on concurrent need for immediate emergency planning for the most impacted communities. I don't know who can lead that effort - is there a COORDINATED Bay Area Emergency Services group? - but the bottom line is, we need to do something NOW in some affected communities, while the plans enabled by this process are worked out. Again, thank you.

COMMENT #272

Erik Alm

erik.alm@dot.ca.gov

10/17/2024 22:19:40

Introduction

The introduction of the Regional Shoreline Adaptation Plan covers the laws, policies, and concepts behind our shoreline planning approach.

If you have comments or suggestions about this section (1.1 -1.4), please share them here.

Caltrans appreciates BCDC's policy statement on Page 17 to "Put nature first whenever possible. Prioritize natural infrastructure solutions that benefit ecosystems and the health of the Bay as well as people, especially in the near-term. Adapting to rising sea levels will require a mix of green and gray infrastructure. Working with nature, instead of against it, can produce better results for both people and wildlife." Caltrans guidance for its Climate Change Adaptation & Resilience program within its State Highway Operations & Preservation Program (SHOPP) has similar language prioritizing nature-based or green/gray adaptation solutions.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Subregional Plan Elements (3.1)

Subregional Plan Elements section contains plan requirements that local governments within BCDC's jurisdiction must meet when submitting Subregional Plans.

If you have comments or suggestions about this section (3.1), please share them here

More explicit guidance on how to plan for assets that traverse multiple sub-regions is recommended, such as transportation infrastructure. The Guidelines should strongly encourage subregions to coordinate with the owners/operators of these regional assets to ensure consistency of adaptation pathways, preferred alternatives and proposed projects. Caltrans is interested in early engagement during development of Subregional Shoreline Adaptation Plans, in order to support locally developed adaptation plans which might have broader regional implications and significance depending on presence of assets such as Caltrans owned and operated highways, bridges and culverts, Right-of-Way and other Caltrans infrastructure.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Plan Development, Submission, and Approvals Process (3.4)

The Plan Development, Submission, and Approvals Process section covers the planning responsibilities of the local governments, who are required to develop a plan, the roles of counties and cities, creating multijurisdictional plans, and the submittal and approval process.

If you have comments or suggestions about this section (3.4), please share them here.

It would be helpful for the Guidelines to clarify the land use authority Subregional Shoreline Adaptation Plans have and how they should relate to preexisting land use plans, such as General Plans, the region's Sustainable Community Strategy and both our regional and State greenhouse gas reduction targets.

The guidelines should provide a mechanism for early consultation with BCDC before a regional entity embarks on creation of a Subregional Shoreline Adaptation Plan, since BCDC should be aware of all

'plans in progress' throughout the region and to prevent overlap. We also suggest BCDC create an online map depicting Subregional Shoreline Adaptation Plans under development with information on status, boundaries, assets, projected SLR, and scopes of work.

General Comments

If you have any final thoughts or feedback about the document that you haven't already covered in the survey, you can share them here. While we appreciate any additional input, please note that this section is for comments not addressed elsewhere.

If you don't have further feedback, there is no need to provide additional comments. Thank you for your participation!

Caltrans Climate Adaptation Planning (CAP) grants have historically funded local Adaptation Plans and are anticipated to continue doing so with the next cycle of CAP grant funding, with \$3M remaining for next cycle statewide from an initial SB1 allocation of \$50M. RSAP-related adaptation planning may also be proposed for the Caltrans Sustainable Communities (SC) grant program, which will have \$29.5M available statewide next cycle. Caltrans encourage all agencies that are required to create a Subregional Shoreline Adaptation Plan to review the Sustainable Transportation Planning Grant Guide, published by the Caltrans Office of Community Planning, and review the Climate Change Adaptation Planning grant program as a possible funding source for Subregional Shoreline Adaptation Plans development. The Call for Applications for the 25/26 cycle is expected in late October 2024. More information on the CAP and SC grant programs can be found here: <https://dot.ca.gov/programs/transportation-planning/division-of-transportation-planning/regional-and-community-planning/sustainable-transportation-planning-grants>

COMMENT #273

Tracy Roth

tracy.roth@terraphase.com

10/18/2024 18:19:07

***The Subregional Shoreline Adaptation Plan Guidelines ***

Minimum Standards (3.2)

Minimum Standards section covers the minimum standards required in the Subregional Plan Element requirements. These standards ensure consistent and effective adaptation planning across the region. If you have comments or suggestions about this section (3.2), please share them here.

The Draft RSAP has identified four minimum required Coastal Flood Hazards and Sea Level Rise (SLR) Scenarios that will require evaluation in the Sub-regional Adaptation Plans:

- 0.8 ft (2050)
- 3.1 ft (2100 Intermediate)
- 4.9 ft (2100 Intermediate-High)
- 6.6 ft (2100 High)

The RSAP Table 3-1 indicates that these SLR projections must be considered for both tidal inundation (adding projections to the local present day MHHW baseline) and for 100-year storm surge conditions (adding projections to the local present day MHHW baseline + an additional 3.5 feet). The RSAP also states the following: For developing adaptation strategies, the RSAP requires adaptation strategies to be developed for the 0.8 ft (2050 Intermediate) and 3.1 ft (2100 Intermediate) scenarios.

- For planned shoreline protection improvement projects, would it be considered sufficient to design physical improvements for the 2050 (0.8 ft.) scenario with consideration of potential additional adaptation pathways or should new shoreline projects be physically designed for the 2100 (3.1 ft.) scenario? This is currently unclear.

- Secondly, when jurisdictions or private developers are planning shoreline SLR adaptation protection projects, is it envisioned that proposed design elevations would meet these projected scenario elevations (at a minimum) or would additional freeboard also be expected?

***The Subregional Shoreline Adaptation Plan Guidelines ***

Data Preview Comments

To support implementation of the RSAP, BCDC provides regionally available data layers to visualize existing conditions, map Strategic Regional Priorities, support vulnerability assessments and inform adaptation strategies and pathways.

If you have comments or suggestions about the draft data layers and analysis, please share them here.

Comments on Appendix 4.1 Data Sources and Analytical Methodology

4.1.1 Combined Flood Hazards

The RSAP states the USGS CoSMoS shallow groundwater rise maps will be used to assess the combined flooding hazard of surface water inundation and groundwater rise. However, the RSAP does not clarify which data sets will be used and what the criteria are for selection of a specific data set or set of maps.

The USGS CoSMoS model has produced at least twelve individual model results or data sets for the range of predicted SLR scenarios. The model uses two different sea level datums (mean sea level and mean higher high water) for three assumed hydrogeologic unit types (less permeable/shallow water table, moderate, and more permeable/deeper water table). Additionally, some of the available model results use linear superposition of the SLR magnitudes onto the simulated water table (i.e. "flux controlled") and

others use the topographic-controlled method that allows for simulated emergent groundwater to be removed from the model when it overlaps with low-lying topographic features.

The CoSMoS groundwater models are meant to be used for screening purposes only because of the simplifying and overly conservative assumptions used in their development. The limitations with use of these tools with respect to evaluation of future groundwater conditions include the following:

- The models were developed using simplified assumptions about hydrogeologic units (thickness, hydraulic properties, etc.). The developers attempt to address the simplification and unknown conditions by simulating groundwater flow using a range of hydraulic conductivity; however, the values do not necessarily represent observed conditions in the shallow aquifers of the Bay Area.
- The models simulate steady-state conditions under a mean annual average recharge scenario using data from 2000 – 2013 and therefore do not adequately represent current conditions nor do they consider future precipitation and infiltration conditions.
- The models do not consider localized pumping influence, stormwater infrastructure or future development grades.
- The models were calibrated using water level data obtained from GeoTracker, but the published information is not transparent regarding what data were used and how well the model result matched the data.
- Some of the model simulations were performed using mean higher high water (MHHW) as the datum for sea level. This is an inappropriate datum to evaluate the groundwater response to SLR because the response to daily tidal fluctuations is often significantly diminished over short distances from the shoreline. The simulations using mean sea level are more appropriate for use.
- For the model scenarios evaluated using linear superposition (in other words, various magnitudes of SLR were superimposed on the simulated groundwater surfaces), the model does not adequately simulate the change in groundwater conditions due to SLR. This is because the model does not consider local influences that have greater control on groundwater levels than the response to SLR. Likewise, the groundwater response to SLR dissipates with distance from the shoreline because of several other natural and anthropogenic factors including local and regional hydrostratigraphy, surface water interaction, stormwater management, groundwater extraction, and more.

Although these tools are useful to screen and identify potential areas of groundwater emergence, it is likely they over-predict future impacts, particularly with respect to how the groundwater response to SLR dissipates with distance from the shoreline. We recommend the RSAP encourages stakeholders to perform independent analyses of available water level data to provide site-specific assessments of potential future conditions. Information in the conceptual and numerical models developed for Groundwater Sustainability Plans (GSPs) and compilations of historical water level data in and around the vicinity of areas of interest can be used to evaluate groundwater trends in relation to local conditions (topography, surface water features, infrastructure, etc.). Evaluations can be conducted for areas where initial vulnerability assessments using the CoSMoS model results identify vulnerable assets at risk from SLR-induced groundwater rise. Given the relatively large area of impact predicted by the existing screening tools and the potential cost associated with mitigating such large areas potentially subject to permanent flooding, the recommended analysis would be well worth the additional cost and effort to provide a more detailed, relevant analysis of future risk to assets, including people and the environment. The insights gained from a groundwater analysis could be used to develop and recommend adaptations that address area-specific potential groundwater impacts and the compounded flooding due to surface water inundation and groundwater rise and emergence.

General Comments

If you have any final thoughts or feedback about the document that you havent already covered in the survey, you can share them here. While we appreciate any additional input, please note that this section is for comments not addressed elsewhere.

If you dont have further feedback, there is no need to provide additional comments. Thank you for your participation!

Other General Comments:

- The RSAP guidelines should be revised to better encourage and/or incentivize the utilization of true nature-based adaptation solutions over traditional hard/grey infrastructure approaches that are more often being utilized?
- It is important for the RSAP to provide an evaluation/discussion of unintended consequences associated with hard infrastructure SLR protection measures (e.g., seawalls) that are only focused on providing a barrier to inland flooding of Bay waters without considering the potential for trapping of elevated emerging groundwater without providing a mechanism for release.
- Considering that the San Francisco Bay Trail is located adjacent to the shoreline throughout a large portion of the Bay Area, the RSAP should include a consistent set of accepted (pre-approved) adaptation design strategies and example cross-sections that can be uniformly applied and utilized by multiple jurisdictions to adapt shoreline reaches that include Bay Trail segments.
- The Draft RSAP should explicitly acknowledge and identify/map potential areas where future tidal wetland habitat can be planned and created directly adjacent (upgradient) to portions of the San Francisco Bay shoreline that are currently surrounded by narrow rock riprap levees that will be subject to tidal inundation under future SLR scenarios. This would be helpful to support the development of Sub-regional Adaptation Plans.

COMMENT #274

Kristina Hill

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10/18/2024 21:49:06

***The Subregional Shoreline Adaptation Plan Guidelines ***

Minimum Standards (3.2)

Minimum Standards section covers the minimum standards required in the Subregional Plan Element requirements. These standards ensure consistent and effective adaptation planning across the region. If you have comments or suggestions about this section (3.2), please share them here.

I think this is a place where monitoring has to occur. If a jurisdiction does the minimum, what is it actually doing? Tracking these actions using metrics is consistent with Action 9.1 and 9.2 of the Joint Platform.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Plan Development, Submission, and Approvals Process (3.4)

The Plan Development, Submission, and Approvals Process section covers the planning responsibilities of the local governments, who are required to develop a plan, the roles of counties and cities, creating multijurisdictional plans, and the submittal and approval process.

If you have comments or suggestions about this section (3.4), please share them here.

Once again, if submittals do not contain the information needed to track progress using metrics as is stated in the Joint Platform Action 9, then this section should specify info that is required for meaningful metrics.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Tools to Support Plan Development (3.5)

The Tools to Support Plan Development section covers the resources to augment local capacity and reduce barriers to plan development.

If you have comments or suggestions about this section (3.5), please share them here.

If people need technical assistance to develop data that can be analyzed with consistent region-wide metrics, that would be important to note here.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Bay Plan Amendment No. 1-24

BCDC Staff provided Preliminary Recommendations to the Commission on Bay Plan Amendment No. 1-24 in the Staff Report.

If you have comments about the Staff Report and Bay Plan Amendment No. 1-24, please share them here.

Does the Amendment say that the planning process is consistent with the Joint Platform? If so, that seems to require that meaningful metrics would be included in a tracking process - either by the applicant or by BCDC.

General Comments

If you have any final thoughts or feedback about the document that you havent already covered in the survey, you can share them here. While we appreciate any additional input, please note that this

section is for comments not addressed elsewhere.

If you dont have further feedback, there is no need to provide additional comments. Thank you for your participation!

I appreciate the BCDC staff's hard work on this - especially the data tools and equity components were managed very professionally and I think very well.

COMMENT #275

Jean Severinghaus

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10/18/2024 22:29:49

Introduction

The introduction of the Regional Shoreline Adaptation Plan covers the laws, policies, and concepts behind our shoreline planning approach.

If you have comments or suggestions about this section (1.1 -1.4), please share them here.

Glad for unifying a plan for the Bay.

Glad it's not force of law at this point.

***The One Bay Vision and Strategic Regional Priorities ***

One Bay Vision and Strategic Regional Priorities section outlines the shared goals for successful adaptation planning in our region, identifies key issues and their spatial patterns, and details the necessary policy responses for local action. Developed through extensive collaboration, this section provides a comprehensive framework for our approach.

If you have comments or suggestions about this section (2.1 - 2.3), please share them here.

I love on the Corte Madera OLU on the creek mouth shoreline on stilts. We have a large number of jurisdictions: GGBHTD across the creek, County of Marin in creek along with CA State Lands Comm, private owners on Boardwalk properties, CDFW and Town of Corte Madera contiguous to us, eventually Audubon. We need firm language from BCDC RSAP for protecting the vegetated primordial salt marshes, and the mudflats, as sea level continues to rise. The OLU guidance is good. But what jurisdiction folds all these jurisdictions together for an RSAP? Please add back in more direct language to protect vegetated salt marshes. We are spending billions\$ to resurrect salt marshes as buffers, rightly so. But add language to put appropriate SLR protections to marsh scarps. And to augment mudflats with clean dredge spoils. Thanks.

I also applaud the commissioner's ask to make sure creative solutions are held open as possibilities. We need creative solutions.

***The Subregional Shoreline Adaptation Plan Guidelines ***

Plan Development, Submission, and Approvals Process (3.4)

The Plan Development, Submission, and Approvals Process section covers the planning responsibilities of the local governments, who are required to develop a plan, the roles of counties and cities, creating multijurisdictional plans, and the submittal and approval process. If you have comments or suggestions about this section (3.4), please share them here.

As explained above I do not see how we are represented in the RSAP process due to so many immediate jurisdictions near me in the OLU

COMMENT #276

Denean Ni

dni@sfcjpa.org

10/18/2024 22:48:16

***The One Bay Vision and Strategic Regional Priorities ***

One Bay Vision and Strategic Regional Priorities section outlines the shared goals for successful adaptation planning in our region, identifies key issues and their spatial patterns, and details the necessary policy responses for local action. Developed through extensive collaboration, this section provides a comprehensive framework for our approach.

If you have comments or suggestions about this section (2.1 - 2.3), please share them here.

All infrastructure, including housing, critical infrastructure, highways and transit, should include future sea level rise projections at the time of design. Building codes, design standards, etc. may need to be revisited and revised given the new science available.

General Comments

If you have any final thoughts or feedback about the document that you havent already covered in the survey, you can share them here. While we appreciate any additional input, please note that this section is for comments not addressed elsewhere.

If you dont have further feedback, there is no need to provide additional comments. Thank you for your participation!

The draft document is clear and provides great detail and background on the RSAP. Due to the depth and complexity of the Subregional Guidelines, suggest that workshops be held to guide local governments and jurisdictions on the plan submission process.

COMMENT #277

Mary Spicer

maryspicer222@gmail.com

10/18/2024 22:53:37

***The One Bay Vision and Strategic Regional Priorities ***

One Bay Vision and Strategic Regional Priorities section outlines the shared goals for successful adaptation planning in our region, identifies key issues and their spatial patterns, and details the necessary policy responses for local action. Developed through extensive collaboration, this section provides a comprehensive framework for our approach.

If you have comments or suggestions about this section (2.1 - 2.3), please share them here.

2.3.7 I work with I Heart Oakland Alameda Estuary. We clear garbage, plastics and debris from the areas around Jack London Aquatic Center to Union Point. With the increase of storms, we've seen a major increase in debris and smashed boats and non functioning storm drains. I am very concerned about sea level rise and the amount of toxic areas in this area of the Oakland Estuary. There is much in this area that can be disregarded as it is not easy to see via land. We are very concerned about the areas around jack london aquatic to union pt - around the coast guard island bridge. Curious how to work with an area that is so populated and has many toxic and superfund areas.

General Comments

If you have any final thoughts or feedback about the document that you havent already covered in the survey, you can share them here. While we appreciate any additional input, please note that this section is for comments not addressed elsewhere.

If you dont have further feedback, there is no need to provide additional comments. Thank you for your participation!

I am grateful this is happening.