

San Francisco Bay Conservation and Development Commission

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Appendix B: Detailed Staff Analysis of Proposed Revisions to Bay Plan Climate Change Findings and Policies

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Table 1. Staff Analysis of Existing Bay Plan Climate Change Findings.

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c.	<p>Global surface temperature increases are accelerating the rate of sea level rise worldwide through thermal expansion of ocean waters and melting of land-based ice (e.g., ice sheets and glaciers). Bay water level is likely predicted to rise by a corresponding amount. In the last century, sea level in the Bay rose nearly eight inches. Current science-based projections of global sea level rise over the next century vary widely. Using <u>Derived from the IPCC greenhouse gas emission scenarios 6th Assessment Report and the 2022 Federal Sea Level Rise Technical Report, in 2010 2024 the California Climate Action Team (CAT) developed</u> <u>Ocean Protection Council (OPC) updated its sea level rise projections (relative to sea level in 2000) for the state that, along with site specific estimates for 14 tide gauges along the California Coast. These projections extend to 2150 with 5 scenarios for each decade: Low, Intermediate-Low, Intermediate, Intermediate-High, and High. The state recommends using the Intermediate to High scenarios to inform sea level rise planning and project decisions. The recommended statewide averages range from 10 to 17 inches 0.8 to 1.2 feet by 2050, 17 to 32 inches 3.1 to 6.6 feet by 2100, and 6.1 to 11.9 feet by 2150. 2070, and 31 to 69 inches at the end of the century. The CAT has recognized that it may not be appropriate to set definitive sea level rise projections, and, based on a variety of factors, state agencies may use different sea level rise</u></p>	<p>Revise to update sea level rise predictions from 2010 to current best available science.</p>



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	<p>projections. Although the CAT OPC values are generally recognized as the best science-based sea level rise projections for California, scientific uncertainty remains regarding the pace and amount of sea level rise. Moreover, melting of the Greenland and Antarctic ice sheets may not be reflected well in current sea level rise projections. As additional data are collected and analyzed, sea level rise projections will likely change over time and OPC updates its guidelines regularly. The National Academy of Sciences is in the process of developing a Sea Level Rise Assessment Report that will address the potential impacts of sea level rise on coastal areas throughout the United States, including California and the Bay Area.</p>	
e.	<p>Shoreline areas currently vulnerable to a 100-year flood event may be subjected to inundation by high tides at mid-century. Over time, shoreline areas currently vulnerable to temporary flooding from storm events may be permanently inundated. Sea level rise will also exacerbate groundwater rise. In some low-lying areas, the groundwater table may reach the surface and cause emergent groundwater flooding. Groundwater rise poses unique challenges for infrastructure and may risk mobilizing contaminants from toxic sites. Much of the developed shoreline may require new or upgraded shoreline protection to reduce damage from flooding. Shoreline areas that have subsided are especially vulnerable to sea level rise and may require more extensive shoreline protection. The Commission, along with other agencies such as the National Oceanic and Atmospheric Administration, the Federal Emergency Management Agency, the United States Army Corps of Engineers, cities, counties, and flood control districts, is responsible for protecting the public and the Bay ecosystem from flood hazards. This can be best achieved by using a range of scientifically based scenarios, including projections, which correspond to higher rates of sea level rise. In planning and designing projects for the Bay shoreline, it is prudent to rely on the most current science-based and regionally specific projections of future sea level rise, develop strategies and policies that can accommodate sea level rise over a specific planning horizon (i.e., adaptive management strategies), and thoroughly analyze new development to determine whether it can be adapted to sea level rise.</p>	<p>Revise to update inundation predictions from 2010 to current best available science.</p>
o.	<p>Approaches for ensuring public safety in developed vulnerable shoreline areas through adaptive management strategies include but are not limited to: (1) protecting existing and planned appropriate infill development <u>through the end of the useful life of the development</u>; (2) <u>prioritizing water-dependent and water-oriented uses along the shoreline and considering placing other uses away from vulnerable shorelines</u>; (2) (3) <u>accommodating flooding by building or renovating</u></p>	<p>Revise to align with standards described in the RSAP.</p>

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	<p>structures or infrastructure systems that are resilient or adaptable over time; (3) (4) discouraging permanent new development when adaptive management strategies cannot protect public safety; (4) allowing only new uses that can be removed or phased out if adaptive management strategies are not available as inundation threats increase; and (5) over time and where feasible and appropriate, removing existing development where public safety cannot otherwise be ensured. Determining the appropriate approach and financing structure requires the weighing of various policies and is best done through a collaborative approach that directly involves the affected communities and other governmental agencies with authority or jurisdiction. Some adaptive management strategies may require action and financing on the regional or sub-regional level across jurisdictions.</p>	
p.	<p>The Every four years, the Association of Bay Area Governments and the Metropolitan Transportation Commission update Plan Bay Area, the region’s long-range plan for housing, economic development, transportation, and environmental resilience, initiated the FOCUS program to develop a regional strategy that promotes a more compact Bay Area land use pattern. In consultation with local governments, the FOCUS program has identified Priority Development Areas for infill development in the Bay Area. These Priority Development Areas, along with other sites, are anticipated to be key components of the Bay Area’s Sustainable Communities Strategy that will be adopted and periodically updated pursuant to the Sustainable Communities and Climate Protection Act of 2008 (SB 375). Plan Bay Area incorporates a set of growth geographies, such as Priority Development Areas, Priority Conservation Areas, and Priority Production Areas, that guide future growth in housing and jobs over the next 30 years. One of the Commission’s objectives in adopting climate change policies is to facilitate implementation of Plan Bay Area the Sustainable Communities Strategy. Some shoreline areas that are vulnerable to flooding are already improved with public infrastructure and private development that has regionally significant economic, cultural or social value, and can accommodate infill development.</p>	<p>Revise to reflect the Metropolitan Transportation Commission/Association of Bay Area Government’s updated terminology and planning processes.</p>
r.	<p>In some cases, the regional goals of encouraging infill development, remediating environmentally degraded land, redeveloping closed military bases and concentrating housing and job density near transit may conflict with the goal of minimizing flood risk by avoiding development in low-lying areas vulnerable to flooding. Methods to minimize this conflict, include, but are not limited to: clustering infill or redevelopment in low-lying areas on a portion of the property to reduce the area that must</p>	<p>Revise to reflect the MTC/ABAG’s updated terminology and planning processes.</p>

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	<p>be protected; formulating an adaptation strategy for dealing with rising sea level and shoreline flooding with definitive goals and an adaptive management plan for addressing key uncertainties for the life of the project; incorporating measures that will enhance project resilience and sustainability; and developing a project-based financial strategy and/or a public financing strategy, as appropriate, to fund future flood protection for the project, which may also protect existing nearby development. Reconciling these different worthy goals and taking appropriate action requires weighing competing policy considerations and would be best accomplished through a collaborative process involving diverse stakeholders, similar to that being undertaken by the Joint Policy Committee to develop the Sustainable Communities Strategy.</p>	
u.	<p>Government jurisdictional boundaries and authorities in the Bay Area are <u>often in conflict incongruent</u> with the regional scale and nature of climate-related challenges. The <u>Bay Area Regional Collaborative, Joint Policy Committee</u>, which is comprised of regional agencies, provides a framework for regional <u>coordination decision-making</u> to address climate change through consistent and effective regionwide policy and to provide local governments with assistance and incentives for addressing climate change. The Commission can <u>collaborates</u> with the <u>Bay Area Regional Collaborative and its member agencies</u> Joint Policy Committee to assure that the Bay Plan Climate Change policies are integrated with the emerging Sustainable Communities Strategy and other regional agencies' policies that deal with climate change issues.</p>	<p>Revise to reflect updated terminology.</p>
w.	<p>The <u>California Climate Adaptation Strategy, mandated by Assembly Bill 1482 (Gordon, 2015) and AB 1384 (Gabriel, 2022), link together the state's existing and planned climate adaptation efforts and prioritize the most vulnerable communities, ecosystems, and economic sectors. California Ocean Protection Council has endorsed the guiding principles of the California Climate Adaptation Strategy, which recommends that state agencies pursue</u> <u>It includes the following policy objectives for state agencies in their adaptation planning:</u></p> <ul style="list-style-type: none"> • <u>Strengthen Protections for Climate Vulnerable Communities</u> • <u>Bolster Public Health and Safety to Protect Against Increasing Climate Risks</u> • <u>Build a Climate Resilient Economy</u> 	<p>Revise to reflect the California Climate Adaptation Strategy's updated policy objectives.</p>

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	<ul style="list-style-type: none"> • <u>Accelerate Nature-Based Climate Solutions and Strengthen Climate Resilience of Natural Systems</u> • <u>Make Decisions Based on the Best Available Climate Science</u> • <u>Partner and Collaborate to Leverage Resources</u> • Protect public health and safety and critical infrastructure; • Protect, restore, and enhance ocean and coastal ecosystems, on which the State economy and well-being depend; • Ensure public access to coastal areas and protect beaches, natural shoreline, and park and recreational resources; • Plan and design new development and communities for long-term sustainability in the face of climate change; • Facilitate adaptation of existing development and communities to reduce their vulnerability to climate change impacts over time; and • Begin now to adapt to the impacts of climate change. <p><u>Sea level rise adaptation and coastal resilience is an important component of California's overall climate adaptation approach. The strategy calls for closer alignment among coastal planning in light of sea level rise. Due to the significant value of critical infrastructure, the strategy calls for proactive planning to support resilience of critical infrastructure against sea level rise. It includes actions to protect, restore, and create coastal wetlands and subtidal habitats, and test innovative nature-based climate solutions. Additionally, it calls on California to take actions that ensure continued public access to California's coast in light of changing shoreline conditions and sea-level rise, prioritizing climate vulnerable communities. Lastly, it calls for incorporating tribal governments into planning processes for climate actions.</u></p> <p>The California Climate Adaptation Strategy recognizes that significant and valuable development has been built along the California coast for over a century. Some of the development is currently threatened by sea level rise or will be threatened in the near future. Similarly, the coastal zone is home to many threatened or endangered species and sensitive habitats. The strategy acknowledges that the high financial, ecological, social and cultural costs of protecting everything may prove to be impossible; in the long run, protection of everything may be both futile and environmentally</p>	

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	<p>destructive. The strategy recommends that decision guidance strategies frame cost-benefit analyses so that all public and private costs and benefits are appropriately considered.</p> <p>The strategy further recommends that state agencies should generally not plan, develop, or build any new significant structure in a place where that structure will require significant protection from sea-level rise, storm surges, or coastal erosion during the expected life of the structure. However, the strategy also acknowledges that vulnerable shoreline areas containing existing development or proposed for new development that has or will have regionally significant economic, cultural, or social value may have to be protected, and infill development in these areas should be closely scrutinized and may be accommodated. The strategy recommends that state agencies should incorporate this policy into their decisions. If agencies plan, permit, develop or build any new structures in hazard zones, the California Climate Adaptation Strategy recommends that agencies employ or encourage innovative engineering and design solutions so that the structures are resilient to potential flood or erosion events, or can be easily relocated or removed to allow for progressive adaptation to sea level rise, flood and erosion.</p> <p>The strategy further recommends that the state should consider prohibiting projects that would place development in undeveloped areas already containing critical habitat, and those containing opportunities for tidal wetland restoration, habitat migration, or buffer zones. The strategy also encourages projects that protect critical habitats, fish, wildlife and other aquatic organisms and connections between coastal habitats. The strategy recommends pursuing activities that can increase natural resiliency, such as restoring tidal wetlands, living shorelines, and related habitats; managing sediment for marsh accretion and natural flood protection; and maintaining upland buffer areas around tidal wetlands.</p>	

Table 2. Staff Analysis of Proposed New Bay Plan Climate Change Findings.

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x.	<p><u>In 2011, BCDC adopted new landmark Bay Plan Climate Change Policies after an extensive public process. These policies provide standards for the Commission to review projects within its jurisdiction for resilience and adaptability over time to rising sea level, and called for the Commission to collaborate with partners to develop a regional sea level rise adaptation strategy for protecting critical developed shoreline areas and natural ecosystems, enhancing the resilience of Bay and shoreline systems and increasing their adaptive capacity. Recommendations for the regional strategy included that the strategy (1) incorporate an adaptive management approach; (2) be consistent with the goals of SB 375 and the principles of the California Climate Adaptation Strategy; (3) be updated regularly to reflect changing conditions and scientific information; (4) include maps of shoreline areas that are vulnerable to flooding based on projections of future sea level rise and shoreline flooding, prepared under the direction of a qualified engineer and regularly updated in consultation with government agencies with authority over flood protection; and (5) pay particular attention to identifying and encouraging the development of long-term regional flood protection strategies that may be beyond the fiscal resources of individual local agencies. Further policy considerations aimed to advance regional public safety and economic prosperity, enhance Bay ecosystems, integrate protection of shoreline development with ecosystem protection, encourage innovative approaches, address issues of environmental justice and social equity, encourage shoreline remediation, and more. This policy guidance was and continues to be instrumental in guiding future Commission planning efforts that led to the creation of the Regional Shoreline Adaptation Plan.</u></p> <p><u>To support development of the regional strategy, in 2011 BCDC launched its award-winning Adapting to Rising Tides Program that continues to work with local jurisdictions around the Bay to develop multi-sector, cross-jurisdictional projects to understand the risks from rising sea level and assess adaptation responses. After nearly a decade of working closely with cities and counties on understanding local vulnerability to sea level rise, BCDC published Adapting to Rising Tides Bay Area, which provided a comprehensive look at the interconnectedness of vulnerable systems across the Bay. To identify shared solutions to regional vulnerability, in 2019 the Commission convened Bay Adapt: Regional Strategy for a Rising Bay in partnership with a broad range of Bay Area leaders. After two years of collaborative work, the Bay Adapt Joint</u></p>	<p>Add. This new Climate Change Finding provides background to support the establishment and adoption of the RSAP. Finding X provides an overview of the Commission’s work on climate change over the past decade and beyond, including the establishment of the Climate Change policies in 2011. The Climate Change policies directed the Commission to work collaboratively across the region to develop a regional strategy for sea level rise adaptation. The RSAP represents the regional strategy envisioned by these original Climate Change policies. The Finding also provides an overview of the development the Adapting to Rising Tides Program, and the convening of Bay Adapt and the release of the Joint Platform, which led to the eventual development of the RSAP.</p>

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	<p><u>Platform was adopted in 2021. The Joint Platform is a regional, consensus-driven strategy that lays out the actions necessary to protect people and the natural and built environments from sea level rise. The Joint Platform contains six guiding principles, nine actions, and 21 tasks.</u></p> <p>The guiding principles are to:</p> <ul style="list-style-type: none"> (7) <u>Support socially vulnerable communities.</u> (8) <u>Put nature first whenever possible.</u> (9) <u>Solve interconnected problems at the same time.</u> (10)<u>Practice inclusive, community-led governance and decision-making.</u> (11)<u>Support existing efforts but plan for the long term.</u> (12)<u>Pick the right strategy for the right place at the right time.</u> 	
y.	<p><u>Senate Bill (SB) 272 (Laird 2023): Sea Level Rise Planning and Adaptation requires all local governments within the Commission’s jurisdiction to address sea level rise through preparation of subregional San Francisco Bay shoreline resiliency plans, henceforth called Subregional Shoreline Adaptation Plans, subject to approval by the Commission. SB 272 requires the Commission to establish guidelines under which local governments must prepare the plans. Local governments within the Commission’s jurisdiction must submit plans consistent with the adopted guidelines by January 1, 2034, with updates thereafter. Pursuant to SB 272, local governments that receive approval by the Commission will be prioritized for state funding, upon appropriation by the Legislature. These plans must include, at a minimum, all of the following:</u></p> <ul style="list-style-type: none"> <u>(1) The use of the best available science.</u> <u>(2) A vulnerability assessment that includes efforts to ensure equity for at-risk communities.</u> <u>(3) Sea level rise adaptation strategies and recommended projects.</u> <u>(4) Identification of lead planning and implementation agencies.</u> <u>(5) A timeline for updates, as needed, based on conditions and projections and as determined by the local government in agreement with BCDC.</u> 	<p>Add. This new Climate Change Finding provides background to support the establishment and adoption of the RSAP. Finding Y describes Senate Bill 272 and summarizes its main requirements. The RSAP has been developed to implement SB 272.</p>

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z.	<p><u>Building from the Joint Platform and Adapting to Rising Tides (ART) Bay Area (2020), the Commission, in collaboration with regional, state, and federal agencies, local governments, and the public, BCDC developed the Regional Shoreline Adaptation Plan to meet the requirements of SB 272 and embrace the strategies and goals of the regional strategy originally called for by the Climate Change policies. The Commission has incorporated by reference into the Bay Plan the Regional Shoreline Adaptation Plan as a plan addressing special needs. The Regional Shoreline Adaptation Plan sets forth a One Bay regional vision that address major issues facing the Bay Area today, as set forth below.</u></p> <p><u>Vision: As sea levels rise, the Bay Area’s diverse communities come together to transform how we live, work, plan, and adapt along our changing shorelines. In this future, communities are healthy, safe, and have greater access to the shoreline where they can feel connected to the Bay’s edge and experience the beauty and wonder of thriving habitats we depend upon to sustain our quality of life. Our region remains connected so that networks of people and goods can move with ease and get to the places they need to go. The services we rely upon keep our communities and economies running and are designed for the long-term. Achieving this future will require governments, the private sector, and communities to make a commitment to equity, address past harms, and take on complex, interrelated challenges together. A resilient future for the San Francisco Bay Area starts now and continues for generations to come.</u></p> <p><u>As sea levels rise:</u></p> <ul style="list-style-type: none"> (1) <u>Communities are healthy and vibrant.</u> (2) <u>Healthy Baylands ecosystems thrive.</u> (3) <u>Places are designed for changing shorelines.</u> (4) <u>Critical services are reliable.</u> (5) <u>The Bay shoreline is accessible to all.</u> (6) <u>Safe and reliable transportation connects the region.</u> (7) <u>People and ecosystems are safe from contamination risks.</u> (8) <u>Regional collaboration drives efficient and effective adaptation.</u> <p><u>In addition, the Regional Shoreline Adaptation Plan provides for Strategic Regional Priorities and Subregional Shoreline Adaptation Plan Guidelines to direct the local government preparation of</u></p>	<p>Add. This new Climate Change Finding provides background to support the establishment and adoption of the RSAP. Finding Z establishes and provides an overview of the RSAP, and articulates its One Bay Vision and describes the Strategic Regional Priorities that underpin the RSAP. The RSAP is a collection of elements that will evolve over time, and this provides the foundation for that ongoing work. The Guidelines are developed in tandem with the One Bay Vision and Strategic Regional Priorities to provide the enforceable standards through which the Commission will review and approve local government Subregional Shoreline Adaptation Plans.</p>

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	<p><u>“Subregional Shoreline Adaptation Plans” to comply with the requirements of SB 272. Adaptation Standards in the Regional Shoreline Adaptation Plan outline the minimum requirements that must be met to comply with the Subregional Shoreline Adaptation Plan Guidelines, meet local and community needs, and contribute to regional outcomes as defined in the One Bay Vision. The Regional Shoreline Adaptation Plan will evolve to incorporate new elements over time, and the Commission will support local government resilience and adaptation planning through technical assistance.</u></p>	

Table 3. Staff Analysis of Existing Bay Plan Climate Change Policies.

Policy Number	Proposed Revisions to Existing Bay Plan Climate Change Policies	Staff Analysis
1.	<p>The Commission intends that the Bay Plan Climate Change findings and policies will be used as follows <u>for the purposes of reviewing projects and activities by the Commission’s Regulatory Program</u>:</p> <ul style="list-style-type: none"> a. The findings and policies apply only to projects and activities located within the following areas: San Francisco Bay, the 100-foot shoreline band, salt ponds, managed wetlands, and certain waterways, as these areas are described in Government Code section 66610, and the Suisun Marsh, as this area is described in Public Resources Code section 29101; b. For projects or activities that are located partly within the areas described in subparagraph (a) and partly outside such area, the findings and policies apply only to those activities or that portion of the project within the areas described in subparagraph (a); 	<p>Revise. The existing Policy 1 in the Bay Plan clarifies the applicability of the Climate Change findings and policies as they related to the review of permit applications for projects in the Commission’s jurisdiction. Because the RSAP’s findings and policies incorporated into BPA 1-24 are only advisory for projects and activities reviewed by BCDC’s Regulatory Program, and do not change how projects are reviewed for consistency with the Climate Change policies, it is necessary to exclude the RSAP from Policy 1.</p>

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	<p>c. For the purposes of implementing the federal Coastal Zone Management Act, the findings and policies do not apply to projects and activities located outside the areas described in subparagraph (a), even if those projects or activities may otherwise be subject to consistency review pursuant to the federal Coastal Zone Management Act; and</p> <p>d. For purposes of implementing the California Environmental Quality Act, the findings and policies are not applicable portions of the Bay Plan for purposes of CEQA Guideline 15125(d) for projects and activities outside the areas described in subparagraph (a) and, therefore, a discussion of whether such proposed projects or activities are consistent with the policies is not required in environmental documents.</p>	
6.	<p><u>The Regional Shoreline Adaptation Plan (the One Bay Vision, Strategic Regional Priorities, and Subregional Shoreline Adaptation Plan Guidelines) shall provide requirements for achieving coordinated, collaborative sea level rise adaptation planning in San Francisco Bay and shall direct the local governments in their preparation of San Francisco Bay shoreline resiliency plans, henceforth called Subregional Shoreline Adaptation Plans, as required by SB 272. The Subregional Shoreline Adaptation Plan Guidelines shall govern the Commission’s review and approval of the Subregional Shoreline Adaptation Plans. Local governments shall submit Subregional Shoreline Adaptation Plans that are consistent with the Subregional Shoreline Adaptation Plan Guidelines to the Commission for approval and shall update these Plans as provided by SB 272 and the Regional Shoreline Adaptation Plan.</u></p>	<p>Revise. Existing Bay Plan Climate Change Policy 6 directs the Commission, in collaboration with other regional stakeholders, to formulate a regional sea level rise adaptation strategy. The existing policy contains five major recommendations for what the strategy should include, and 13 more specific strategies and goals that the Commission encouraged this regional strategy to address. Policy 6 was intended to be an interim policy until a regional strategy was created, and now that the RSAP is being developed, staff recommends significantly revising Policy 6 to establish the RSAP as incorporating the recommendation and goals of Policy 6 as currently drafted.</p> <p>The newly proposed Policy 6 has three functions. First, it establishes the RSAP into the Bay Plan to govern the Commission’s review of local government Subregional Shoreline Adaptation Plans, thus implementing the</p>

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	<p><u>The Commission shall provide technical and policy assistance on development of Subregional Shoreline Adaptation Plans with respect to shoreline adaptation, including but not limited to: (1) online data and mapping using best available science that is updated regularly to reflect changing conditions and new information; (2) technical support; (3) coordination and interagency collaboration; (4) guidance for undertaking equitable, culturally-relevant public outreach and engagement; and (5) assistance with identifying funding opportunities. Local jurisdictions should coordinate early and regularly with Commission staff to maximize the benefits of collaborative, regional adaptation planning.</u></p> <p><u>The Regional Shoreline Adaptation Plan is a living document that employs an adaptive management approach to planning for rising sea levels. The Regional Shoreline Adaptation Plan should be regularly updated, consistent with the goals of SB 375 and the principles of the California Climate Adaptation Strategy. As the Commission’s resiliency planning continues to evolve, the Commission should:</u></p> <ol style="list-style-type: none"> a. <u>Support research that provides information useful for planning and policy development on the impacts of climate change on the Bay, particularly those related to shoreline flooding.</u> b. <u>Develop, in partnership with the Metropolitan Transportation Commission and the Association of Bay Area Governments, 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. The Strategy should identify and categorize regionally</u> 	<p>requirements of SB 272. Second, it articulates the Commission’s commitment to providing technical and policy assistance on shoreline adaptation for local governments and regional stakeholders. Third, it describes four major goals for the Commission’s ongoing resiliency planning, speaking to the need for implementation of the RSAP to be an evolving process for the Commission in the years to come.</p> <p>To revise Policy 6, staff evaluated how well the RSAP aligns with the recommendations, goals, and strategies that the Commission had outlined in the current policy. In places where the RSAP now implements those recommendations, staff recommends removing such recommendations from the policy. In places where the RSAP does not yet implement Policy 6 recommendations, staff recommends revising or retaining those recommendations.</p> <p>Below is a description of the different elements of the original Policy 6, to demonstrate how the recommendations and goals of Policy 6 are incorporated into the RSAP or retained into the new Policy 6.</p>

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	<p><u>significant sea level rise adaptation projects and strategies, analyze current and projected revenues, and include funding strategies.</u></p> <p>c. <u>Collaborate with local governments to determine where and how existing development should be protected and infill development encouraged, where new development should be permitted, and where existing development should eventually be removed to allow the Bay to migrate inland.</u></p> <p>d. <u>Identify any other needed actions, including any needed changes in law, to successfully implement the Regional Shoreline Adaptation Plan and better link sea level rise adaptation planning to the Commission’s regulatory program.</u></p> <p>The Commission, in collaboration with the Joint Policy Committee, other regional, state and federal agencies, local governments, and the general public, should formulate a regional sea level rise adaptation strategy for protecting critical developed shoreline areas and natural ecosystems, enhancing the resilience of Bay and shoreline systems and increasing their adaptive capacity. The Commission recommends that:</p>	
6.	<p>the strategy incorporate an adaptive management approach;</p>	<p>Revise - Included in RSAP. The RSAP incorporates an adaptive management approach through utilizing adaptation pathways, monitoring approaches, and requiring regular Subregional Plan updates. The RSAP’s One Bay Vision and Subregional Plan Guidelines include and describe how to employ adaptive management approaches in shoreline planning.</p>

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Original Policy 6.	the strategy be consistent with the goals of SB 375 and the principles of the California Climate Adaptation Strategy;	Revise - Included in RSAP. The RSAP is designed to be consistent with SB 375 and the principles of the California Climate Adaptation Strategy (including most recent updates).
Original Policy 6.	the strategy be updated regularly to reflect changing conditions and scientific information and include maps of shoreline areas that are vulnerable to flooding based on projections of future sea level rise and shoreline flooding;	Revise and Retain. Staff recommend including the following language in Revised Policy 6 (see above): “The Commission recommends that the Regional Shoreline Adaptation Plan be regularly updated.” This will allow the plan to reflect changing conditions and best available science on sea level rise and flooding. Additionally, BCDC will develop a mapping platform with Sea Level Rise hazard and other flooding data that will be regularly updated to support regional adaptation planning.
Original Policy 6.	the maps be prepared under the direction of a qualified engineer and regularly updated in consultation with government agencies with authority over flood protection; and	Revise - Included in RSAP. BCDC’s maps incorporated into the RSAP and developed as technical assistance for developing Subregional Shoreline Adaptation Plans rely on 2016 AECOM maps which were prepared under the direction of a qualified engineer, and the maps will be updated regularly along with the RSAP.
Original Policy 6.	<p>particular attention be given to identifying and encouraging the development of long-term regional flood protection strategies that may be beyond the fiscal resources of individual local agencies.</p> <p>Ideally, the regional strategy will determine where and how existing development should be protected and infill development encouraged, where new development should be permitted, and where existing development should eventually be removed to allow the Bay to migrate inland.</p> <p>The entities that formulate the regional strategy are encouraged to consider the following strategies and goals:-</p>	<p>Revise in part and Retain in part - included in RSAP. The RSAP identifies and encourages the development of long-term regional flood risk reduction strategies by requiring cross-jurisdictional coordination, planning for sufficiently long-term horizons, and integrating sea level rise planning with Plan Bay Area’s Growth Geographies, the region’s comprehensive plan related to housing and development, as well as local housing elements and local land use plans. The following draft RSAP’s Strategic Regional Priorities (SRP) and adaptation standards address these objectives.</p> <ul style="list-style-type: none"> - Develop and maintain cross-jurisdictional flood risk reduction (SRP)

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		<ul style="list-style-type: none"> - Promote safe, sustainable and strategic growth and density. (SRP) - Include actions to mitigate involuntary displacement risk. (SRP) - Plan for changes in land use, removal of assets, and/or equitable relocation. (Adaptation Standard) <p>The RSAP does not specifically determine “locations where new development should be permitted and where existing development should eventually be removed to allow for inland migration.” However, the RSAP provides guidance and data to guide how locally-developed subregional plans consider these topics. The revision to Policy 6 slightly reframes and retains this language, which will inform future review of BCDC’s Regulatory Program and authority.</p>
Original Policy 6(a).	<p>advance regional public safety and economic prosperity by protecting: (i) existing development that provides regionally significant benefits; (ii) new shoreline development that is consistent with other Bay Plan policies; and (iii) infrastructure that is crucial to public health or the region’s economy, such as airports, ports, regional transportation, wastewater treatment facilities, major parks, recreational areas and trails;</p>	<p>Revise - Included in RSAP. The RSAP advances regional public safety and economic prosperity through the One Bay vision and the following Strategic Regional Priorities (SRP) and adaptation standards:</p> <ul style="list-style-type: none"> - Promote safe, sustainable and strategic growth and density. (SRP) - Maintain reliable critical and emergency services. (SRP) - Maintain regional movement of people and goods. (SRP) - Reduce flood risk in areas with existing development. (Adaptation Standard) - Prioritize water-dependent uses along the shoreline. (Adaptation Standard) <p>These policies support current and planned development that is safe, adaptive, and consistent with other Bay Plan policies such as water-oriented Priority Use Areas, public access and</p>

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		<p>natural habitat protection. The RSAP also identifies and prioritizes flood risk reductions to critical infrastructure for airports, ports, regional transportation, wastewater treatment facilities, recreation areas, and waterfront parks.</p>
<p>Original Policy 6(b).</p>	<p>enhance the Bay ecosystem by identifying areas where tidal wetlands and tidal flats can migrate landward; assuring adequate volumes of sediment for marsh accretion; identifying conservation areas that should be considered for acquisition, preservation or enhancement; developing and planning for flood protection; and maintaining sufficient transitional habitat and upland buffer areas around tidal wetlands;</p>	<p>Revise - Included in RSAP. RSAP Adaptation Standard #4, “Improve Baylands habitats and facilitate their long-term survival,” requires protecting, restoring, and enhancing Baylands habitats and identifying opportunities for wetlands migration space, upland transition zones, and opportunity zones for restoration. Additional details in this standard include connecting habitats to sustainable sources of sediments and utilizing a whole watershed approach.</p> <p>Adaptation Standard #15, “Preserve natural, undeveloped, and open space” calls for the preservation of these lands for uses such as promoting public access, buffer space for future adaptation, and space for wetlands migrations space and upland transition zones.</p> <p>The RSAP Subregional Shoreline Adaptation Plan Guidelines requires a description of land use policies to support the adaptation strategies meeting the standards, which may include identification of conservation areas that should be considered for acquisition, preservation or enhancement. Ongoing support for identifying appropriate non-structural adaptation land use policies will be incorporated into the TA program.</p> <p>Staff recommends removing “developing and planning for flood protection” because this is included in the RSAP.</p> <p>Staff recommends removing “maintaining sufficient transitional habitat and upland buffer areas around tidal</p>

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		wetlands” because migration space is addressed by RSAP’s Adaptation Standards #4 (“Improve Baylands habitats and facilitate their long-term survival.”) and #15 (“Preserve natural, undeveloped, and open space”).
Original Policy 6(c).	integrate the protection of existing and future shoreline development with the enhancement of the Bay ecosystem, such as by using feasible shoreline protection measures that incorporate natural Bay habitat for flood control and erosion prevention;	Revise - Included in RSAP. RSAP’s Adaptation Standard #12 “Use nature-based adaptation where feasible” requires the use of natural and nature-based adaptation suitable to the landscape to the greatest extent feasible before using traditional hardscape approaches. Adaptation Standard #14, “Integrate multiple benefits into adaptation” further requires a consideration of how adaptation must identify opportunities to incorporate community, environmental, and economic benefits in addition to flood risk reduction.
Original Policy 6(d).	encourage innovative approaches to sea level rise adaptation;	Revise - Included in RSAP. The RSAP encourages innovative approaches to sea level rise adaptation. The RSAP Subregional Shoreline Adaptation Plan Guidelines sets a required process for developing Subregional Plans and outcomes as defined by the Adaptation Standards. The specific strategies, tools, and approaches utilized to achieve those outcomes can vary by local jurisdiction and creative approaches, including using multi-benefit approaches, are encouraged.
Original Policy 6(e).	identify a framework for integrating the adaptation responses of multiple government agencies;	Revise - Included in RSAP. The RSAP’s Element E (Implementation Plan) identifies a framework for integrating adaptation responses of multiple government agencies.
Original Policy 6(f).	integrate regional mitigation measures designed to reduce greenhouse gas emissions with regional adaptation measures designed to address the unavoidable impacts of climate change;	Revise - Included in RSAP. RSAP’s Adaptation Standard #14, “Integrate multiple benefits into adaptation” encourages the consideration for reducing greenhouse gas emissions

Policy Number	Proposed Revisions to Existing Bay Plan Climate Change Policies	Staff Analysis
		associated with adaptation approaches. The RSAP’s Strategic Regional Priority, “Promote safe, sustainable and strategic growth and density” integrates Plan Bay Area’s Growth Geographies which represent regional greenhouse gas reduction and mitigation measures.
Original Policy 6(g).	address environmental justice and social equity issues;	Revise - Included in RSAP. The RSAP has strong environmental justice and social equity underpinnings. The Guidelines require local governments to complete an Equity Assessment, and requires that equitable and meaningful engagement occurs throughout the Subregional Plan development.
Original Policy 6(h).	integrate hazard mitigation and emergency preparedness planning with adaptation planning by developing techniques for reducing contamination releases, structural damage and toxic mold growth associated with flooding of buildings, and establishing emergency assistance centers in neighborhoods at risk from flooding;	Revise - Included in RSAP. The RSAP’s Minimum Categories and Assets requires local governments to analyze exposure to contaminated sites, and Strategic Regional Priority “Reduce contamination risks in environmental justice communities” specifically considers contaminated sites in environmental justice communities. In addition, the RSAP’s Strategic Regional Priority, “Maintain reliable critical and emergency services” ensures that emergency response centers are included in a vulnerability assessment and are included in subregional shoreline adaptation plans.
Original Policy 6(i).	advance regional sustainability, encourage infill development and job creation, provide diverse housing served by transit and protect historical and cultural resources;	Revise - Included in RSAP. The RSAP’s integration with Plan Bay Area encourages the advancement of regional sustainability, and encourages infill development and job creation. In addition, the importance of cultural and historic resources is listed as part of the Minimum Categories and Assets in the RSAP.

Policy Number	Proposed Revisions to Existing Bay Plan Climate Change Policies	Staff Analysis
Original Policy 6(j).	encourage the remediation of shoreline areas with existing environmental degradation and contamination in order to reduce risks to the Bay’s water quality in the event of flooding;	Revise - Included in RSAP. The RSAP encourages the remediation of shoreline areas through Strategic Regional Priority, “Reduce contamination risks in environmental justice communities”.
Original Policy 6(k).	support research that provides information useful for planning and policy development on the impacts of climate change on the Bay, particularly those related to shoreline flooding;	Revise and Retain. BCDC’s Adapting to Rising Tides program supports and provides research. This is an ongoing need and will be incorporated into the Technical and Policy Assistance Program.
Original Policy 6(l).	identify actions to prepare and implement the strategy, including any needed changes in law; and	Retain. The RSAP does not identify actions to prepare and implement the strategy, including any needed changes to the law.
Original Policy 6(m).	identify mechanisms to provide information, tools, and financial resources so local governments can integrate regional climate change adaptation planning into local community design processes.	Revise and Retain. BCDC’s forthcoming Technical and Policy Assistance program will provide information, tools, and financial resources to local governments so that they can integrate regional climate change adaptation planning into local community design processes. Policy 6 has been revised with updated recommendations for the Commission to provide this assistance.
7.	Until a regional sea level rise adaptation strategy can be completed <u>The Commission should evaluate each project proposed in vulnerable areas on a case-by-case basis to determine the project’s public benefits, resilience to flooding, and capacity to adapt to climate change impacts. The Commission may consult the Regional Shoreline Adaptation Plan and consider any approved Subregional Shoreline Adaptation Plan as advisory in its review of projects and activities associated with those plans by the Commission’s Regulatory Program.</u> The following specific types of projects have regional benefits, advance regional goals, and should be encouraged, if their regional benefits and their advancement of regional goals outweigh the risk from flooding:	Revise. By way of BPA 1-24, the RSAP will be the regional sea level rise adaptation strategy required by the existing Policy 6. However, the Commission needs to develop an approach to coordinate the Commission’s regulatory program with the RSAP. Until that approach is developed, the Commission can consider the RSAP and any approved Subregional Shoreline Adaptation Plan as advisory in reviewing project regional benefits in determining consistency with the Climate Change policies.

Policy Number	Proposed Revisions to Existing Bay Plan Climate Change Policies	Staff Analysis
	<ul style="list-style-type: none"> i. remediation of existing environmental degradation or contamination, particularly on a closed military base; j. a transportation facility, public utility or other critical infrastructure that is necessary for existing development or to serve planned development; k. a project that will concentrate employment or housing near existing or committed transit service (whether by public or private funds or as part of a project), particularly within those Priority Development Areas that are established by the Association of Bay Area Governments and endorsed by the Commission, and that includes a financial strategy for flood protection that will minimize the burdens on the public and a sea level rise adaptation strategy that will adequately provide for the resilience and sustainability of the project over its designed lifespan; and l. a natural resource restoration or environmental enhancement project. The following specific types of projects should be encouraged if they do not negatively impact the Bay and do not increase risks to public safety: <ul style="list-style-type: none"> m. repairs of an existing facility; n. a small project; o. a use that is interim in nature and either can be easily removed or relocated to higher ground or can be amortized within a period before removal or relocation of the proposed use would be necessary; and p. a public park. 	

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Appendix C: Clean Copy of Proposed Bay Plan Climate Change Findings and Policies

Proposed Revisions to Existing Bay Plan Climate Change Findings

- c. Global surface temperature increases are accelerating the rate of sea level rise worldwide through thermal expansion of ocean waters and melting of land-based ice (e.g., ice sheets and glaciers). Bay water level is predicted to rise by a corresponding amount. In the last century, sea level in the Bay rose nearly eight inches. Derived from the IPCC 6th Assessment Report and the 2022 Federal Sea Level Rise Technical Report, in 2024 the California Ocean Protection Council (OPC) updated its sea level rise projections (relative to sea level in 2000) for the state, along with site specific estimates for 14 tide gauges along the California Coast. These projections extend to 2150 with 5 scenarios for each decade: Low, Intermediate-Low, Intermediate, Intermediate-High, and High. The state recommends using the Intermediate to High scenarios to inform sea level rise planning and project decisions. The recommended statewide averages range from 0.8 to 1.2 feet by 2050, 3.1 to 6.6 feet by 2100, and 6.1 to 11.9 feet by 2150. Although the OPC values are generally recognized as the best science-based sea level rise projections for California, scientific uncertainty remains regarding the pace and amount of sea level rise. As additional data are collected and analyzed, sea level rise projections will likely change over time and OPC updates its guidelines regularly.

- e. Over time, shoreline areas currently vulnerable to temporary flooding from storm events may be permanently inundated. Sea level rise will also exacerbate groundwater rise. In some low-lying areas, the groundwater table may reach the surface and cause emergent groundwater flooding. Groundwater rise poses unique challenges for infrastructure and may risk mobilizing contaminants from toxic sites. Much of the developed shoreline may require new or upgraded shoreline protection to reduce damage from flooding. Shoreline areas that have subsided are especially vulnerable to sea level rise and may require more extensive shoreline protection. The Commission, along with other agencies such as the National Oceanic and Atmospheric Administration, the Federal Emergency Management Agency, the United States Army Corps of Engineers, cities, counties, and flood control districts, is responsible for protecting the public and the Bay ecosystem from flood hazards. This can be best achieved by using a range of scientifically based scenarios, including projections, which correspond to higher rates of sea level rise. In planning and designing projects for the Bay shoreline, it is prudent to rely on the most current science-based and regionally specific projections of future sea level rise, develop strategies and policies that can accommodate sea level rise over a specific planning horizon (i.e., adaptive management strategies), and thoroughly analyze new development to determine whether it can be adapted to sea level rise.



- o. Approaches for ensuring public safety in developed vulnerable shoreline areas through adaptive management strategies include but are not limited to: (1) protecting existing and planned appropriate infill development through the end of the useful life of the development; (2) prioritizing water-dependent and water-oriented uses along the shoreline and considering placing other uses away from vulnerable shorelines; (3) accommodating flooding by building or renovating structures or infrastructure systems that are resilient or adaptable over time; (4) discouraging permanent new development when adaptive management strategies cannot protect public safety as inundation threats increase; and (5) over time and where feasible and appropriate, removing existing development where public safety cannot otherwise be ensured. Determining the appropriate approach and financing structure requires the weighing of various policies and is best done through a collaborative approach that directly involves the affected communities and other governmental agencies with authority or jurisdiction. Some adaptive management strategies may require action and financing on the regional or sub-regional level across jurisdictions.
- p. Every four years, the Association of Bay Area Governments and the Metropolitan Transportation Commission update Plan Bay Area, the region's long-range plan for housing, economic development, transportation, and environmental resilience, pursuant to the Sustainable Communities and Climate Protection Act of 2008 (SB 375). Plan Bay Area incorporates a set of growth geographies, such as Priority Development Areas, Priority Conservation Areas, and Priority Production Areas, that guide future growth in housing and jobs over the next 30 years. One of the Commission's objectives in adopting climate change policies is to facilitate implementation of Plan Bay Area. Some shoreline areas that are vulnerable to flooding are already improved with public infrastructure and private development that has regionally significant economic, cultural or social value, and can accommodate infill development.
- r. In some cases, the regional goals of encouraging infill development, remediating environmentally degraded land, redeveloping closed military bases and concentrating housing and job density near transit may conflict with the goal of minimizing flood risk by avoiding development in low-lying areas vulnerable to flooding. Methods to minimize this conflict, include, but are not limited to: clustering infill or redevelopment in low-lying areas on a portion of the property to reduce the area that must be protected; formulating an adaptation strategy for dealing with rising sea level and shoreline flooding with definitive goals and an adaptive management plan for addressing key uncertainties for the life of the project; incorporating measures that will enhance project resilience and sustainability; and developing a project-based financial strategy and/or a public financing strategy, as appropriate, to fund future flood protection for the project, which may also protect existing nearby development. Reconciling these different worthy goals and taking appropriate action requires weighing competing policy considerations and would be best accomplished through a collaborative process involving diverse stakeholders.

- u. Government jurisdictional boundaries and authorities in the Bay Area are often in conflict with the regional scale and nature of climate-related challenges. The Bay Area Regional Collaborative, which is comprised of regional agencies, provides a framework for regional coordination to address climate change through consistent and effective regionwide policy and to provide local governments with assistance and incentives for addressing climate change. The Commission collaborates with the Bay Area Regional Collaborative and its member agencies to assure that the Bay Plan Climate Change policies are integrated with the emerging Sustainable Communities Strategy and other regional agencies' policies that deal with climate change issues.
- w. The California Climate Adaptation Strategy, mandated by Assembly Bill 1482 (Gordon, 2015) and AB 1384 (Gabriel, 2022), link together the state's existing and planned climate adaptation efforts and prioritize the most vulnerable communities, ecosystems, and economic sectors. It includes the following policy objectives for state agencies in their adaptation planning:
 - Strengthen Protections for Climate Vulnerable Communities
 - Bolster Public Health and Safety to Protect Against Increasing Climate Risks
 - Build a Climate Resilient Economy
 - Accelerate Nature-Based Climate Solutions and Strengthen Climate Resilience of Natural Systems
 - Make Decisions Based on the Best Available Climate Science
 - Partner and Collaborate to Leverage Resources

Sea level rise adaptation and coastal resilience is an important component of California's overall climate adaptation approach. The strategy calls for closer alignment among coastal planning in light of sea level rise. Due to the significant value of critical infrastructure, the strategy calls for proactive planning to support resilience of critical infrastructure against sea level rise. It includes actions to protect, restore, and create coastal wetlands and subtidal habitats, and test innovative nature-based climate solutions. Additionally, it calls on California to take actions that ensure continued public access to California's coast in light of changing shoreline conditions and sea-level rise, prioritizing climate vulnerable communities. Lastly, it calls for incorporating tribal governments into planning processes for climate actions.

Proposed New Bay Plan Climate Change Findings

- x. In 2011, BCDC adopted new landmark Bay Plan Climate Change Policies after an extensive public process. These policies provide standards for the Commission to review projects within its jurisdiction for resilience and adaptability over time to rising sea level, and called for the Commission to collaborate with partners to develop a regional sea level rise adaptation strategy for protecting critical developed shoreline areas and natural ecosystems, enhancing the resilience of Bay and shoreline systems and

increasing their adaptive capacity. Recommendations for the regional strategy included that the strategy (1) incorporate an adaptive management approach; (2) be consistent with the goals of SB 375 and the principles of the California Climate Adaptation Strategy; (3) be updated regularly to reflect changing conditions and scientific information; (4) include maps of shoreline areas that are vulnerable to flooding based on projections of future sea level rise and shoreline flooding, prepared under the direction of a qualified engineer and regularly updated in consultation with government agencies with authority over flood protection; and (5) pay particular attention to identifying and encouraging the development of long-term regional flood protection strategies that may be beyond the fiscal resources of individual local agencies. Further policy considerations aimed to advance regional public safety and economic prosperity, enhance Bay ecosystems, integrate protection of shoreline development with ecosystem protection, encourage innovative approaches, address issues of environmental justice and social equity, encourage shoreline remediation, and more. This policy guidance was and continues to be instrumental in guiding future Commission planning efforts that led to the creation of the Regional Shoreline Adaptation Plan.

To support development of the regional strategy, in 2011 BCDC launched its award-winning Adapting to Rising Tides Program that continues to work with local jurisdictions around the Bay to develop multi-sector, cross-jurisdictional projects to understand the risks from rising sea level and assess adaptation responses. After nearly a decade of working closely with cities and counties on understanding local vulnerability to sea level rise, BCDC published Adapting to Rising Tides Bay Area, which provided a comprehensive look at the interconnectedness of vulnerable systems across the Bay. To identify shared solutions to regional vulnerability, in 2019 the Commission convened Bay Adapt: Regional Strategy for a Rising Bay in partnership with a broad range of Bay Area leaders. After two years of collaborative work, the Bay Adapt Joint Platform was adopted in 2021. The Joint Platform is a regional, consensus-driven strategy that lays out the actions necessary to protect people and the natural and built environments from sea level rise. The Joint Platform contains six guiding principles, nine actions, and 21 tasks.

The guiding principles are to:

- (1) Support socially vulnerable communities.
- (2) Put nature first whenever possible.
- (3) Solve interconnected problems at the same time.
- (4) Practice inclusive, community-led governance and decision-making.
- (5) Support existing efforts but plan for the long term.
- (6) Pick the right strategy for the right place at the right time.

- y. Senate Bill (SB) 272 (Laird 2023): Sea Level Rise Planning and Adaptation requires all local governments within the Commission’s jurisdiction to address sea level rise through preparation of subregional San Francisco Bay shoreline resiliency plans, henceforth called Subregional Shoreline Adaptation Plans, subject to approval by the Commission. SB 272 requires the Commission to establish guidelines under which local governments must prepare the plans. Local governments within the Commission’s jurisdiction must submit plans consistent with the adopted guidelines by January 1, 2034, with updates thereafter. Pursuant to SB 272, local governments that receive approval by the Commission will be prioritized for state funding, upon appropriation by the Legislature. These plans must include, at a minimum, all of the following:
- (1) The use of the best available science.
 - (2) A vulnerability assessment that includes efforts to ensure equity for at-risk communities.
 - (3) Sea level rise adaptation strategies and recommended projects.
 - (4) Identification of lead planning and implementation agencies.
 - (5) A timeline for updates, as needed, based on conditions and projections and as determined by the local government in agreement with BCDC.
- z. Building from the Joint Platform and Adapting to Rising Tides (ART) Bay Area (2020), the Commission, in collaboration with regional, state, and federal agencies, local governments, and the public, BCDC developed the Regional Shoreline Adaptation Plan to meet the requirements of SB 272 and embrace the strategies and goals of the regional strategy originally called for by the Climate Change policies. The Commission has incorporated by reference into the Bay Plan the Regional Shoreline Adaptation Plan as a plan addressing special needs. The Regional Shoreline Adaptation Plan sets forth a One Bay regional vision that address major issues facing the Bay Area today, as set forth below.

Vision: As sea levels rise, the Bay Area’s diverse communities come together to transform how we live, work, plan, and adapt along our changing shorelines. In this future, communities are healthy, safe, and have greater access to the shoreline where they can feel connected to the Bay’s edge and experience the beauty and wonder of thriving habitats we depend upon to sustain our quality of life. Our region remains connected so that networks of people and goods can move with ease and get to the places they need to go. The services we rely upon keep our communities and economies running and are designed for the long-term. Achieving this future will require governments, the private sector, and communities to make a commitment to equity, address past harms, and take on complex, interrelated challenges together. A resilient future for the San Francisco Bay Area starts now and continues for generations to come.

As sea levels rise:

- (1) Communities are healthy and vibrant.

- (2) Healthy Baylands ecosystems thrive.
- (3) Places are designed for changing shorelines.
- (4) Critical services are reliable.
- (5) The Bay shoreline is accessible to all.
- (6) Safe and reliable transportation connects the region.
- (7) People and ecosystems are safe from contamination risks.
- (8) Regional collaboration drives efficient and effective adaptation.

In addition, the Regional Shoreline Adaptation Plan provides for Strategic Regional Priorities and Subregional Shoreline Adaptation Plan Guidelines to direct the local government preparation of “Subregional Shoreline Adaptation Plans” to comply with the requirements of SB 272. Minimum Standards in the Regional Shoreline Adaptation Plan outline the minimum requirements that must be met to comply with the Subregional Shoreline Adaptation Plan Guidelines, meet local and community needs, and contribute to regional outcomes as defined in the One Bay Vision. The Regional Shoreline Adaptation Plan will evolve to incorporate new elements over time, and the Commission will support local government resilience and adaptation planning through technical assistance.

Proposed Revisions to Existing Bay Plan Climate Change Policies

1. The Commission intends that the Bay Plan Climate Change findings and policies will be used as follows for the purposes of reviewing projects and activities by the Commission’s Regulatory Program:
 - a. The findings and policies apply only to projects and activities located within the following areas: San Francisco Bay, the 100-foot shoreline band, salt ponds, managed wetlands, and certain waterways, as these areas are described in Government Code section 66610, and the Suisun Marsh, as this area is described in Public Resources Code section 29101;
 - b. For projects or activities that are located partly within the areas described in subparagraph (a) and partly outside such area, the findings and policies apply only to those activities or that portion of the project within the areas described in subparagraph (a);
 - c. For the purposes of implementing the federal Coastal Zone Management Act, the findings and policies do not apply to projects and activities located outside the areas described in subparagraph (a), even if those projects or activities may otherwise be subject to consistency review pursuant to the federal Coastal Zone Management Act; and
 - d. For purposes of implementing the California Environmental Quality Act, the findings and policies are not applicable portions of the Bay Plan for purposes of CEQA Guideline 15125(d) for projects and activities outside the areas described in

subparagraph (a) and, therefore, a discussion of whether such proposed projects or activities are consistent with the policies is not required in environmental documents.

6. The Regional Shoreline Adaptation Plan (the One Bay Vision, Strategic Regional Priorities, and Subregional Shoreline Adaptation Plan Guidelines) shall provide requirements for achieving coordinated, collaborative sea level rise adaptation planning in San Francisco Bay and shall direct the local governments in their preparation of San Francisco Bay shoreline resiliency plans, henceforth called Subregional Shoreline Adaptation Plans, as required by SB 272. The Subregional Shoreline Adaptation Plan Guidelines shall govern the Commission's review and approval of the Subregional Shoreline Adaptation Plans. Local governments shall submit Subregional Shoreline Adaptation Plans that are consistent with the Subregional Shoreline Adaptation Plan Guidelines to the Commission for approval and shall update these Plans as provided by SB 272 and the Regional Shoreline Adaptation Plan. The Commission shall provide technical and policy assistance on development of Subregional Shoreline Adaptation Plans with respect to shoreline adaptation, including but not limited to: (1) online data and mapping using best available science that is updated regularly to reflect changing conditions and new information; (2) technical support; (3) coordination and interagency collaboration; (4) guidance for undertaking equitable, culturally-relevant public outreach and engagement; and (5) assistance with identifying funding opportunities. Local jurisdictions should coordinate early and regularly with Commission staff to maximize the benefits of collaborative, regional adaptation planning.

The Regional Shoreline Adaptation Plan is a living document that employs an adaptive management approach to planning for rising sea levels. The Regional Shoreline Adaptation Plan should be regularly updated, consistent with the goals of SB 375 and the principles of the California Climate Adaptation Strategy. As the Commission's resiliency planning continues to evolve, the Commission should:

- a. Support research that provides information useful for planning and policy development on the impacts of climate change on the Bay, particularly those related to shoreline flooding.
- b. Develop, in partnership with the Metropolitan Transportation Commission and the Association of Bay Area Governments, 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. The Strategy should identify and categorize regionally significant sea level rise adaptation projects and strategies, analyze current and projected revenues, and include funding strategies.
- c. Collaborate with local governments to determine where and how existing development should be protected and infill development encouraged, where new development should be permitted, and where existing development should eventually be removed to allow the Bay to migrate inland.

- d. Identify any other needed actions, including any needed changes in law, to successfully implement the Regional Shoreline Adaptation Plan and better link sea level rise adaptation planning to the Commission's regulatory program.
7. The Commission should evaluate each project proposed in vulnerable areas on a case-by-case basis to determine the project's public benefits, resilience to flooding, and capacity to adapt to climate change impacts. The Commission may consult the Regional Shoreline Adaptation Plan and consider any approved Subregional Shoreline Adaptation Plan as advisory in its review of projects and activities associated with those plans by the Commission's Regulatory Program. The following specific types of projects have regional benefits, advance regional goals, and should be encouraged, if their regional benefits and their advancement of regional goals outweigh the risk from flooding:
- a. remediation of existing environmental degradation or contamination, particularly on a closed military base;
 - b. a transportation facility, public utility or other critical infrastructure that is necessary for existing development or to serve planned development;
 - c. a project that will concentrate employment or housing near existing or committed transit service (whether by public or private funds or as part of a project), particularly within those Priority Development Areas that are established by the Association of Bay Area Governments and endorsed by the Commission, and that includes a financial strategy for flood protection that will minimize the burdens on the public and a sea level rise adaptation strategy that will adequately provide for the resilience and sustainability of the project over its designed lifespan; and
 - d. a natural resource restoration or environmental enhancement project.
The following specific types of projects should be encouraged if they do not negatively impact the Bay and do not increase risks to public safety:
 - e. repairs of an existing facility;
 - f. a small project;
 - g. a use that is interim in nature and either can be easily removed or relocated to higher ground or can be amortized within a period before removal or relocation of the proposed use would be necessary; and
 - h. a public park.