

Bay Adapt Public Comments and Response

Comment Number	Comment Type	Date Received	Commenter	Organization	Comment Summary	Detailed Comment	Response
1	Public Forum	8/25/21	Andrew Aldrich		Incentives/regulations for participation	What can be done about cities that not only don't want help, but insist on acting irresponsibly. A recent example is Newark, that is planning to destroy valuable wetlands for more shoreline development.	Comment included in Implementation Brief
2	Public Forum	8/25/21	Ann Spaulding		How to prioritize	Have bayside toxic sites been studied as a Bay region to determine which sites will be exposed at different levels of SLR, and if so, does this plan prioritize these sites for remediation?	Included more language on contamination and the need for cleanup
3	Public Forum	8/25/21	Anonymous Attendee		Details on Implementation	Can you give an example of how the platform would enable a specific project in a vulnerable area?	This may be added to the website in the future
4	Public Forum	8/25/21	Anonymous Attendee		Incentives/regulations for participation	How is BCDC proposing to incentivize these projects?	See tasks 5.1 and 8.1 for more detail
5	Public Forum	8/25/21	Anonymous Attendee		Sediment as a resource need	Does BCDC have ideas about how to get clean fill quickly and cheaply to the Shoreline to complete these projects? This is sometimes the most expensive part of these projects.	Comment included in Implementation Brief
6	Public Forum	8/25/21	Anonymous Attendee		Incentives/regulations for participation	For projects proposing to do tidal marsh restoration by adding fill to the Bay, is there a way to provide mitigation credit for construction grey infrastructure to protect from SLR?	Comment included in Implementation Brief
7	Public Forum	8/25/21	Anonymous Attendee		Address causes and reduction of SLR	Is there anything we can do regionally to prevent sea level rise, or is Bay Adapt solely focused on resiliency, adaptation, and mitigating risks to sea level rise once it occurs?	Bay Adapt does not address greenhouse gas mitigation
8	Public Forum	8/25/21	Anonymous Attendee		Address Contamination; Details on EJ	Will vulnerable communities/EJ communities be prioritized in adaptation projects- especially those surrounded by contaminated sites?	Language on prioritization of vulnerable communities added
9	Public Forum	8/25/21	Anonymous Attendee		Education	When will climate literacy curriculum be available for educators to use?	Comment included in Implementation Brief
10	Public Forum	8/25/21	Anonymous Attendee		Incentives/regulations for participation	If Foster City can afford to build a levee should there be a cap and trade approach asking them to do green infrastructure elsewhere to balance grey versus green infrastructure.	Comment included in Implementation Brief
11	Public Forum	8/25/21	Anonymous Attendee		Need additional action from private sector	How will you assure that Corporations will do their part in proportion to the amount of resources they have? It seems that corporations are looking to underfunded government to do it all.	Several business organizations are part of the Bay Adapt Leadership Advisory Group, and their continued participation in implementation will be critical.
12	Public Forum	8/25/21	Anthony Khalil		Details on EJ	Bay Area EJ Communities have been currently and historically impacted by Climate Change—There is more than enough data indicating the disproportionate burdens! Toxic/Industrial Land use, lack of regulatory accountability and the Global Economy centered here all contribute to the lack of Climate Change Preparation/Adaptation for all communities. How do we invest an integrated and local economy that values/implements Bay Adapt Goals/Strategies? Where do we need that most?	Included more language on contamination and the need for cleanup
13	Public Forum	8/25/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Land use and conservation	During the presentation, it was mentioned that in many places we have developed right up to the edges of the Bay. If we are interested in conserving wetlands we need to protect tidal wetlands migration pathways if we want to sustain tidal wetlands in the long-term as sea levels continue to rise. Many areas that could provide migration space fall into regulatory gaps and have no state or federal protection and are extremely vulnerable to development pressure. Will the Bay Adapt process have any influence on this issue and if so how? How do you think this can best be addressed?	Language on need for wetland migration added
14	Public Forum	8/25/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Land use and conservation	Many areas that could provide migration space fall into regulatory gaps and have no state or federal protection and are extremely vulnerable to development pressure. Will the Bay Adapt process have any influence on this issue and if so how? How do you think this can best be addressed?	Language on need for wetland migration added
15	Public Forum	8/25/21	Charles Schafer		Sediment as a resource need	Adrian says that BCDC's mandate is fill and shouldn't be expanded, however he also praises the work done with PBA and says it fills a need. Shouldn't that role be incorporated although not necessarily started off with sticks. And is wait and see really a viable alternative? There are important developments happening now.	See tasks 5.1 and 7.2 for more detail.
16	Public Forum	8/25/21	Chris Choo	Marin County	How to prioritize	Given the likely increase of sea level rise and the slow speed of project development, how do we evaluate the most important things first? How do we get behind the best projects regionally? For the environment? For vulnerable communities? For regional connectivity?	Many tasks in the Joint Platform address this
17	Public Forum	8/25/21	Gita Dev		Incentives/regulations for participation	Since Land use is local, but city councils, or Bd of Supes need some protection from lawsuits by property owners by having in place some regional regulations that force their hand. How can we get some teeth into the Bay Adapt thinking for regional coordination?	Comment included in Implementation Brief
18	Public Forum	8/25/21	Julia Dowell		Address Contamination	Will this plan take into account/address shoreline contamination (ie. Superfund sites) along the Bay and how they will be impacted by sea level rise and are largely surrounded by frontline communities?	Included more language on contamination and the need for cleanup

Bay Adapt Public Comments and Response

Comment Number	Comment Type	Date Received	Commenter	Organization	Comment Summary	Detailed Comment	Response
19	Public Forum	8/25/21	Larry Stoehr		Sediment as a resource need	Part of the reason for bay level rise is the natural silt fill from the rivers. Does BCDC promote dredging of the bay or does it restrict this activity?	Comment included in Implementation Brief
20	Public Forum	8/25/21	Lisa Fisher		Watershed-wide connections (Upstream & Coastal)	This is great work on sea level rise — thank you. Would be great to hear how this group and effort envisions coordinating and maximizing synergies with inland precipitation flooding, extreme heat, drought, air quality and other hazard adaptation planning and action? In this, is there a goal to encourage a “yes and” / co-benefits approach across multi-hazard adaptation rather than the sentiment of competing with other hazard investments? Thank you.	Comment included in Implementation Brief
21	Public Forum	8/25/21	Maureen Parton		Details on Implementation	Let's show proof of concept. Let's focus on a few pilot projects in frontline communities - most at risk - that are multijurisdictional and that show the regional benefit. Let's grow public support for getting going on these projects. This might help get the attention that flooding and sea level rise deserve.	May be included on the website in the future
22	Public Forum	8/25/21	Maureen Parton		Incentives/regulations for participation	Why not a carrot and stick approach together? Government did that with the single-use bag bans both banning plastic and putting a fee on paper with money back for bringing your own bag. People understand flooding but not sea level rise. Let's start there. Almost every jurisdiction can identify flooding in an area in or nearby front line communities that also affect the wider community. Let's make clear and visible through multijurisdictional and multi-benefit adaptation pilot projects that all of our lives and destinies are conjoined.	Comment included in Implementation Brief
23	Public Forum	8/25/21	Michael McCormick	Farralon Strategies	Watershed-wide connections (Upstream & Coastal)	Can the panelists talk a little about the link between SLR in the Bay Area and the Delta - with SLR cascading impacts across our Bay and Delta systems may require deeper governance coordination across the Sacramento, Central Valley, and Bay regions - how does this panel see getting ahead of this issue proactively?	Answered live
24	Public Forum	8/25/21	Nona Dennis		Incentives/regulations for participation	A regulatory approach does not necessarily mean applying sanctions as punitive. This is a very restricted and negative viewpoint. It can also mean establishing common standards , e.g., design standards, or best practices, and then deciding to require them. Much of “regulation” is simply a matter of levelling the playing field and expectations across a broad spectrum of interests. Of course, establishing standards has to be collaborative, but once established, they can greatly simplify process.	Comment included in Implementation Brief
25	Public Forum	8/25/21	Ted Barone		Details on Implementation	Very nice ideals represented but I'm not seeing a plan for implementation. Is there a funded organization with staff? What is the five-year plan for implementation? ; Question for Dana, follow up to my previous implementation question. Would you please give some idea about how that implementation plan is being formulated? What are the priorities? It seems community-based organizations are a high priority in the plan? As I co-lead a CBO, I would like to know what the thinking is and what the timeline might be. Thank you.	Comment included in Implementation Brief
26	Public Forum	8/25/21	Tess Byler		Address hydrological connections	Is threat of rising groundwater addressed as part of SLR?	Need for more information addressed in Task 4.1
27	Public Forum	8/25/21	Tess Byler		Address hydrological connections	Suggest to emphasize the hydraulic connectivity of SLR adaptation projects and need for regional coordination to avoid unintended consequences.	Language on connectivity added
28	Letter	9/8/21	Ms. Margaret Gordon/Co-Director	West Oakland Environmental Indicators Project	Details on EJ	1.The fear of the use of Environmental Justice	The term "environmental justice" is used 17 times in the Joint Platform
29	Letter	9/8/21	Ms. Margaret Gordon/Co-Director	West Oakland Environmental Indicators Project	Details on EJ	2. The fear of being more proactive to communities that have been relining and lack base infrastructure development has been listed as the first communities to receive equity and equity economic community engagement first.	We included additional language explicitly stating that vulnerable communities should be prioritized in plans, projects, and funding
30	Letter	9/8/21	Ms. Margaret Gordon/Co-Director	West Oakland Environmental Indicators Project	Details on EJ	3. There's a lack of clarification on how the CBO and residents will sit at the head of table for decision making, designing, planning in a collaboration and coordination processes	Included BARHII engagement best practices as example
31	Letter	9/8/21	Ms. Margaret Gordon/Co-Director	West Oakland Environmental Indicators Project	Address Contamination	4. No process on cleaning contamination areas right now	Included more language on contamination and the need for cleanup
32	Letter	9/8/21	Ms. Margaret Gordon/Co-Director	West Oakland Environmental Indicators Project	Education	5. Who are the public education institutions that are creating the career placement per impacted and vulnerable communities	Comment included in Implementation Brief
33	Letter	9/8/21	Ms. Margaret Gordon/Co-Director	West Oakland Environmental Indicators Project	Details on EJ	6. The platform has nothing about the need for training, skilled development for agencies or regulatory staff to participate in community engagement, EJ, use EJ as tool to for engagement, or having partnering agreement, and where's the equity checklist as guidances or a pathway to equity	Included links to BARHII engagement best practices and Equity Checklist
34	Survey	9/17/21	Kate Matthews		Details on Implementation	Action 1: This is a good sentiment, but I don't see a lot in the Platform that illustrates how this will happen, or on what timeline.	Comment included in Implementation Brief
35	Survey	9/17/21	Kate Matthews		Details on EJ	Action 2: I think community-based projects are among the most important projects to have when it comes to climate change. Without meaningful community involvement, a lot of projects peter out quickly and don't have lasting impacts. I think this point is one of the most important in the Platform.	Comment included in Implementation Brief

Bay Adapt Public Comments and Response

Comment Number	Comment Type	Date Received	Commenter	Organization	Comment Summary	Detailed Comment	Response
36	Survey	9/17/21	Kate Matthews		Tracking and sharing progress	Action 9: Tracking progress and making it available for other organizations/projects/etc., is a really important aspect, and I hope that the results of projects are made available to the public.	Comment included in Implementation Brief
37	Survey	9/20/21	Alyssa C.	San Francisco State University Student	Education	Action 3: I think this is an important action to take, especially to get more community members on board. Climate change is a very big topic so it's important that people understand how it can/will effect them and their communities. The information on it can also be overwhelming so it's important it's presented in a way that's simple and easy for people to understand while still keeping in mind how important it is.	Comment included in Implementation Brief
38	Survey	9/20/21	Alyssa C.	San Francisco State University Student	Connections to existing policies	Action 5: This action is a good idea to ensure local and regional plans are on the same page and have the same goals in mind. I think this will reduce confusion or working on unnecessary/secondary plans that may delay the main adaption plans.	Comment included in Implementation Brief
39	Survey	9/20/21	Alyssa C.	San Francisco State University Student	Details on funding	Action 6: This is important because unfortunately, it's very hard to make change without having the funds to do so. It would be great if an adaption fund could be created for all states to use for climate change mitigation and adaption. It's important to consider climate justice in the fund too, and maybe find a way to have extra fund for underprivileged areas/communities that are more vulnerable to climate change events.	See Tasks 1.1, 5.1 and 8.1 on developing equitable planning and funding guidelines, linked to a funding strategy (6.2)
40	Survey	9/20/21	Alyssa C.	San Francisco State University Student	Incentives/regulations for participation	Action 7: It seems the law and regulation process has been one of the main roadblocks regarding climate change adaptation and mitigation. Climate change is an extremely pressing issue that we cannot afford to wait on for certain actions/measures towards if to be approved. At this point, it needs to be treated as a nation emergency in order to enact quicker change.	Comment included in Implementation Brief
41	Survey	9/20/21	Alyssa C.	San Francisco State University Student	Address causes and reduction of SLR	Action 8: I believe our current pledges and/or adaption plans are too long term. For example, companies pledging to lower their CO2 emissions by 2030. Maybe they did this back in 2018 or even 2019. While it may not seem that far away since it's already 2021 now, that is too much time to not be cutting emissions now or in the next year. In my opinion, we don't have that kind of time to just sit, wait, and hope for the best. We need to be adapting to climate change now, and mitigating its impacts.	No response needed
42	Survey	9/20/21	Alyssa C.	San Francisco State University Student	Tracking and sharing progress	Action 9: This action is very important because it holds everyone involved accountable and makes sure everyone is on the same track. It would be great if everyone was required to report their progress every year to ensure they're staying true to their word. If not? Maybe they have to pay a certain amount to the adaption fund to make up for lost time and resources. It's a shame we don't have a system like that now for states and corporations.	Comment included in Implementation Brief
43	Survey	9/22/21	Cindy A Abbott	PEF	Watershed-wide connections (Upstream & Coastal)	Action 1: A unified approach is needed. Please be mindful that actions in the Bay impact the Pacific coast - don't create a problem elsewhere.	No response needed
44	Survey	9/22/21	Cindy A Abbott	PEF	Education	Action 3: Focus on youth so that they understand how their future will be impacted (and they can speak with their parents, grandparents, etc.). The science is clear and impact of the climate crisis is now visible on an almost daily basis.	Comment included in Implementation Brief
45	Survey	9/22/21	Cindy A Abbott	PEF	Land use and conservation	Action 6: Please focus on programs and projects that highlights adaptation versus protection of existing manmade shorelines and infrastructure. We need to move out of the way of nature and let her be the guide.	Comment included in Implementation Brief
46	Survey	9/22/21	Cindy A Abbott	PEF	Connections to existing policies	Action 7: Big concerns about where this could lead, diminishing important CEQA controls and potential long-term impacts.	Action 7 clarified to explicitly state that any changes will not compromise environmental protections, transparency, or community engagement
47	Survey	9/22/21	Cindy A Abbott	PEF	Details on funding	Action 8: Funding good. Faster only if well thought out and a nature-based solution.	No response needed
48	Survey	9/22/21	Cindy A Abbott	PEF	Tracking and sharing progress	Action 9: Measure, measure, measure and share.	No response needed
49	Survey	9/22/21	Cindy A Abbott	PEF	Land use and conservation; Sediment as a resource need	While some projects will necessarily be focused on the near-term, keep them minimal in scope and easy to remove. Keep the focus on long-term nature-based solution. Regardless of pressure for building more housing and industry, avoid putting additional people/businesses in harms way. (Indigenous people visited the shore but didn't build their houses there.) Don't forget the impact of work in the Bay to the coastside (i.e., sediment isn't making it down the coast increasing the loss of beaches).	Comment included in Implementation Brief
50	Survey	9/22/21	Kathleen Schaefer	UC Davis	Watershed-wide connections (Upstream & Coastal)	Action 2: The community may be the wrong scale to focus on. Many Bay Area communities include both shoreline areas and upland areas. It is often difficult to get people who live in the upland areas to contribute to the shoreline areas. Further, community governments are not well suited to addressing low-probability, high-consequence issues. The State Insurance Commissioner's Office advocates for Climate Hazard Abatement Districts modeled after Geologic Hazard Abatement Districts.	No changes. Tasks 1.1 and 8.2 focus on the regional and sub-regional scales.
51	Survey	9/22/21	Kathleen Schaefer	UC Davis	Connections to existing policies	Action 4: This effort should support statewide climate science efforts like ARKStorm 2.0.	Language on statewide climate science efforts added

Bay Adapt Public Comments and Response

Comment Number	Comment Type	Date Received	Commenter	Organization	Comment Summary	Detailed Comment	Response
52	Survey	9/22/21	Kathleen Schaefer	UC Davis	Details on funding	Action 6: Community-Based Insurance can be one piece of the finance puzzle. BCDC should consider implementing the recommendations from the State Insurance Commissioner's Climate Change Working Group.	Comment included in Implementation Brief
53	Survey	9/22/21	Kathleen Schaefer	UC Davis	Connection to emergency preparedness	Good Job! Having said that, I think there needs to be more consideration of the "day after". We will never be able to fully remove or eliminate flood risk. The planning process needs to also plan for the post disaster event. What happens to the low-income uninsured resident of Central San Rafael the day after the flood? What happens to the uninsured homeowner who floods and now has to elevate their home in order to meet the building requirements? What happens to the shoreline homeowner that finds the value of their home is reduced because of the growing awareness of (comment incomplete)	Language on emergency response added
54	Survey	9/22/21	Rick Nahass	Pacifica Climate Committee	Details on EJ	Action 1: The importance of "Regional" public Transportation and equity. Today Regional transit is dominated by 'Rail' to/from big corporation **urban centers**. There is an opportunity to advance regular regional bus corridors to people and small business not on the urban path such as a 1-ride CA1/101 Golden Gate Corridor from Half Moon Bay to Novato.	Comment included in Implementation Brief
55	Letter	9/23/21	Danielle Hutchings Mieler, P.E.	City of Alameda Sustainability & Resilience Manager	Watershed-wide connections (Upstream & Coastal)	The Bay Adapt Joint Platform recognizes that adaptation crosses jurisdictional boundaries and will require coordination and collaboration, but its focus is primarily on collaboration between cities/counties and regional governments and assumes that a regional vision will be implemented by cities and counties. While that is certainly an important aspect of coordination, given the complex and overlapping ownership of the shoreline, it is important to recognize that collaboration will be essential between a wide range of agencies. For example, in the San Leandro Bay, adaptation coordination needs to happen between Cities of Alameda, Oakland, San Leandro, as well as Caltrans, Port of Oakland, East Bay Regional Parks who all own certain portions of the shoreline. Other agencies and community groups are also important stakeholders in the process. We believe the way forward is by formalizing organizational structures at the OLU scale following the successful models of the Hayward Area Shoreline Planning Agency, OneShoreline and San Francisquito Creek JPA in San Mateo County, and being explored in the San Leandro OLU. These types of formal organizations are needed to accelerate project funding, development and construction across jurisdictional boundaries. A critical step for organizing the OLUs will also be developing visions and concepts that align with the larger regional vision and organization. State and regional governments can facilitate and encourage this kind of collaboration and support funding mechanisms for multiple jurisdictions to efficiently share project costs.	Language updated based on comment
56	Letter	9/23/21	Danielle Hutchings Mieler, P.E.	City of Alameda Sustainability & Resilience Manager	Details on EJ	Alameda supports the need to fund CBOs and frontline communities to participate in the adaptation planning. In addition, we should also help build capacity for individuals and organizations from frontline communities to develop technical expertise and contribute to the process through data collection, monitoring, analysis, design, etc. Such efforts would support career advancement/training and wealth building in underserved communities and encourage the creation of local small businesses to meet these needs. Consultant procurement should prioritize those who are local and are owned by or employ staff from frontline communities. Efforts to weave climate literacy into school programs should also work to inspire youth to pursue STEM careers and contribute to the solutions and help bring diverse voices to the field.	Comment included in Implementation Brief
57	Letter	9/23/21	Danielle Hutchings Mieler, P.E.	City of Alameda Sustainability & Resilience Manager	Details on permitting efficiencies	The City of Alameda strongly supports the recommendations in the Joint Platform to streamline the permitting and environmental review processes. We need state and federal support to streamline CEQA and NEPA processes to make them easier and faster and quick resolution for conflicts. State legislation should focus on CEQA streamlining for adaptation projects similar to what they have done for other high priority projects. Recognizing that adaptation projects are multi-jurisdictional, we need to be able to get through CEQA review with multiple jurisdictions involved. We also need funding agencies to prioritize streamlined grant processes and progress reporting that include best practice project dashboard tools and holistic project approaches. Time is running out and we can't get bogged down in slow, inefficient processes.	Comment included in Implementation Brief
58	Letter	9/23/21	Danielle Hutchings Mieler, P.E.	City of Alameda Sustainability & Resilience Manager	Details on funding	State funding should prioritize projects that are working collaboratively across jurisdictional boundaries and focusing on nature-based solutions, while understanding that nature based is not always feasible in every location. Projects need to be addressed in a holistic way with both the nature-based and "grey infrastructure" moving forward together as one viable project for adaptation in a specific geographic area. Funding streams should focus on ensuring the most appropriate concept results from the funding source and not piecemeal items such as only being willing to fund nature based solutions when often multiple strategies will be needed in a specific geographic area.	Comment included in Implementation Brief

Bay Adapt Public Comments and Response

Comment Number	Comment Type	Date Received	Commenter	Organization	Comment Summary	Detailed Comment	Response
59	Letter	9/23/21	Danielle Hutchings Mieler, P.E.	City of Alameda Sustainability & Resilience Manager	Clarify language	<p>Executive Summary</p> <ul style="list-style-type: none"> • Please have a proof reader go through this document for minor touch ups such as spell check. • Please use feet and not inches when describing sea level rise. It is easier for people to envision. • Why shared solutions section: please add that 'What one jurisdiction does, impacts other areas of the bay' under "A regional problem requires regional solutions." • "Technical assistance" include "and other sub-area governance" – by including only local governments, it maintains the status quo thinking of jurisdictional boundaries rather than having more expansive thinking to sub-areas, which is likely to create more successful solutions; perhaps it could read: "Technical assistance to plan and implement projects faster." <p>Joint Platform</p> <ul style="list-style-type: none"> • Please see comments above that are applicable to the full document. • Page 2: Please swap out this photo of the bridge and add in one on the bay habitat to highlight habitat protection and nature-based solutions. • Page 4: It is a problem statement without specifics as to how many feet sea level is expected to rise by 2060 – even a range would be helpful as a frontand- center statement – four feet of sea level rise in 40 years, which is about 1 ft every ten years. • Pages 40-41: Please add "local agencies and CBOs" in the "possible leads" column in that much of this work will be happening at the local or subregional level; the chart looks more top-down approach. • Page 7: please include the definition of environmental justice directly in the document. 	Language updated based on comment
60	Letter	9/23/21	Marc Zeppetello		Details on Implementation	<p>The Draft JP feedback opportunity survey asks respondents, among other things, to indicate the respondent's level of excitement to see each of the Draft JP's nine actions accomplished and to rank those actions based on the respondent's priorities. Asking these questions, and considering the responses received, should be helpful in engaging the public in the Bay Adapt process and promoting collaboration on a "One Bay" vision to adapt to sea level rise. However, looking forward toward implementation, it will be important to pursue and integrate all the identified actions and associated tasks. In that regard, certain of the identified actions and tasks should be relatively straightforward and not particularly controversial, such as Action 4 -- basing plans and projects on best science, data, and knowledge. In contrast, other actions will involve more difficult challenges and potential for conflict, such as Action 6 -- figuring out how to fund adaptation. For implementation of the Joint Platform to be successful, relatively more effort will need to be focused on the actions and tasks involving the more difficult and complex issues, regardless of how the various actions are ranked as priorities by survey respondents.</p>	Comment included in Implementation Brief
61	Letter	9/23/21	Marc Zeppetello		Incentives/regulations for participation	<p>The following comments relate to the tasks under Action 5 -- align local and regional plans into a unified adaptation approach. Task 5.2 is described as "align state-mandated planning processes around adaptation." In the row for this task in the table on pages 40-41 of the Draft JP, the cell under the column captioned "possible lead(s)," is blank. For the reasons discussed below, this cell in the table should be revised to insert the words, "to be determined" or, at a minimum, "to be considered."</p> <p>The goals of Action 5 include "[l]ocal plans that are coordinated across the region" and "[i]mproved and coordinated state planning requirements for adaptation." Draft JP at 28. However, while recognizing the need to "ensure that [local] plans contribute to a "One Bay solution, whose goals and objectives are shared across cities, counties, and the region," the Draft JP does not include, or call for, any mechanism to actually that ensure local plans are consistent across the region or that a plan adopted by one jurisdiction will avoid or minimize potential adverse effects associated with that jurisdiction's adaptation measures on other jurisdictions along the Bay shoreline.</p> <p>For local jurisdictions along the California ocean coast, the Coastal Commission provides state level review and approval of updates to local coastal programs to address the impacts of accelerated sea level rise. See California Coastal Commission Sea Level Rise Policy Guidance (Aug. 12, 2015), Chapter 5, Addressing Sea Level Rise in Local Coastal Programs. In contrast, currently, no state agency is authorized to review sea level rise adaptation plans, or the hazard mitigation elements of General Plans, prepared by local jurisdictions in the Bay Area from a regional perspective to ensure consistency with regional goals and objectives related to adaptation.</p> <p>The Draft JP focuses on voluntary efforts and suggests that unspecified and yet to be determined incentives may be created "at the state level for cross-jurisdictional planning to improve the siloed scope of local plans that are often limited to jurisdictional boundaries." Draft JP at 29. However, as the Draft JP recognizes, the water in the Bay will continue to rise at an accelerating rate in the coming decades. Given this inevitability, local adaptation plans, including the hazard mitigation elements of local General Plans, should be as rigorous as possible from the outset. State level review of such plans should be incorporated into the local planning process now to ensure regional consistency and to avoid or minimize adverse effects on other jurisdictions, not deferred until it may be determined in the future that solely local planning without state review has not been effective, or as effective as it could have been, in meeting regional goals and objectives.</p> <p>More specifically, the envisioned Community, Equity and Planning Working Group should consider, and provide recommendations to the Leadership Advisory Group, as to whether Government Code section 65302(g)(4) should be amended to provide for state level review of local hazard mitigation plans, or amendments to such plans, to address climate adaptation and resiliency strategies. In that regard, for larger projects and when planning shoreline areas around the Bay, BCDC currently</p>	Comment included in Implementation Brief

Bay Adapt Public Comments and Response

Updated October 14, 2021

Comment Number	Comment Type	Date Received	Commenter	Organization	Comment Summary	Detailed Comment	Response
62	Letter	9/23/21	Marc Zeppetello		Connections to existing policies	On a related issue, Task 5.1 is described as “provide incentives for robust, coordinated local adaptation plans.” This task would involve developing “plan guidelines and minimum requirements...to develop strong local and community-driven adaptation plans that also contribute to regional goals.” Draft JP at 28. The collaborative development of such guidelines and minimum requirements may be entirely appropriate. However, the Draft JP fails to acknowledge that state law currently requires local jurisdictions to revise their hazard mitigation plans to address climate adaptation and resiliency strategies based on consideration of, among other sources of information, the advice provided in the General Plan Guidelines issued by the Office of Planning and Research (“OPR”). Gov’t Code section 65302(g)(4). From a review of OPR’s website, it appears that the agency has not yet developed specific advice on this issue. Nevertheless, the Community, Equity and Planning Working Group should consider how any guidelines and requirements developed through the implementation of Task 5.1 will relate to, or may be duplicative of or inconsistent with, the advice or guidelines that presumably will ultimately be issued by OPR for revising hazard mitigation plans.	Language updated based on comment
63	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Land use and conservation; Sediment as a resource need	We deeply appreciate the inclusion of language in the Joint Platform that acknowledges and emphasizes the critical role habitats such as tidal wetlands play in restoring and protecting the ecological health of the Bay and resilience of our communities, and the threat posed by sea level rise to tidal wetlands. As BCDC has acknowledged in the Bay Plan, tidal wetlands provide many services which benefit Bay Area residents and wildlife, such as carbon sequestration, nutrient recycling, improvement of water quality, acting as nurseries for fisheries, flood and erosion protection, providing areas for passive recreation, etc. These habitats are at risk of drowning as sea levels continue to rise due to diminishing sediment supplies and lack of lateral (upslope) migration space. We also appreciate and support the sense of urgency in the language of the Joint Platform regarding the need to ensure the Bay and surrounding communities are resilient to the threats posed by climate change. As the rates of predicted sea level rise continue to increase, we risk running out of time to save tidal wetlands if we don’t act quickly and work collaboratively to ensure adequate sediment supplies exist to sustain and restore tidal wetlands, and to act to ensure tidal wetlands migration pathways are protected.	No response needed
64	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Land use and conservation	We see a great need to ensure equity, inclusion and transparency as we implement solutions that are necessary to for regional ecological, societal and economic resilience. We remain concerned that governance gaps exist that allow continued permitting of new development in undeveloped areas along the edges of the Bay that continue to put people in harm’s way as sea levels rise and in doing so create burdens for future generations in terms of providing protection or compensation for poorly-planned development. Such actions also squander increasingly limited opportunities to provide tidal wetlands migration pathways, potential flood accommodation space to protect communities and to sustain crucial services provided by tidal wetlands such as carbon sequestration.	Language updated based on comment
65	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Land use and conservation; Details on permitting efficiencies	p. 11 – “Accelerated permitting and faster project construction.” We believe this refers to permitting for restoration and natural and nature-based solutions, therefore we recommend adding the following clarifying language “Accelerated permitting and faster project construction for tidal wetlands restoration projects and projects that utilize natural and nature-based solutions.” Accelerated permitting cannot occur at the expense of transparency or community and public engagement and should not occur for projects that include land development or flood control projects. Regarding the bullet that mentions metrics “for tracking local and regional progress” - Have available tidal wetlands migration pathways for tidal wetlands been identified for the Bay and Delta? If not, such mapping should be undertaken and impacts to, or conservation of, those areas should be tracked as one of the metrics. Given the concern about the long-term sustainability of tidal wetlands due to diminishing sediment supplies and the extent to which we have developed up to the edges of the Bay, it is imperative that regional impacts to, and the protection/conservation of, tidal wetland migration pathways, also be tracked, to inform future land use decisions along the edges of the Bay.	Language updated based on comment
66	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Land use and conservation; Connections to existing policies	p. 12 – We appreciate the inclusion of language, “If we are to prepare ourselves fully for sea level rise throughout the region, cities and counties must work with local communities and the state and federal governments to make decisions about what should—and shouldn’t—exist long the shoreline in the future.” Unfortunately, it is unclear how “decisions about what shouldn’t exist along the shoreline” would be made and by whom or how they would be enforced. As mentioned, governance gaps exist and state and federal regulations do not exist to protect undeveloped uplands adjacent to the Bay that could serve as tidal wetlands migration pathways. New developments that continue to be permitted at the local level in areas that will be susceptible to sea level rise inundation, either place future residents in harm’s way or create additional financial burdens to protect poorly planned developments.	Comment included in Implementation Brief

Bay Adapt Public Comments and Response

Comment Number	Comment Type	Date Received	Commenter	Organization	Comment Summary	Detailed Comment	Response
67	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Details on EJ; Address contamination	p. 13 – This page focuses on the need to “protect people, habitats and wildlife.” One of the bullets discusses a broad range of serious concerns, “Exposure to toxic substances, spread of disease, worsened pre-existing health conditions.” We are deeply concerned about the heightened potential exposure of communities and the environment to toxic substances as sea levels rise and believe more emphasis needs to be placed on this issue. The Adapting to Rising Tides program provides a link to mapping of contaminated sites in Alameda County ¹ that are vulnerable to flood inundation from rising sea levels. The mapping includes identified Super Fund Sites, Department of Toxic Substance Control (DTSC) sites, Cleanup Program sites, etc. Due to the risk posed by mobilization of contaminants that will impact not just the immediate community, but also adjacent communities and the ecosystems of the Bay, we urge that this issue be given greater attention and priority within the Joint Platform. If similar mapping does not already exist for all counties along the edges of the Bay, that should be identified as a priority action.	Included more language on contamination and the need for cleanup
68	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Clarify language	p. 14 – We appreciate the incorporation of language describing the importance of tidal wetlands and the “prioritization of natural habitats to support a healthy, resilient Bay.” The ending sentence of this page is one of the most important of the entire Joint Platform, “Our efforts now will affect the health and livability of the Bay Area for generations.” This statement should be included in the opening pages of the Joint Platform.	Language updated based on comment
69	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Land use and conservation	p.15 – The message “ Support existing efforts but plan for the long term” is an important message to convey as actions that may conserve wetlands and provide resilience in the short term may not provide sustained wetlands protection and community resilience with increasing sea levels. “Early action is important for regional learning, setting precedents, and shorter-term flood control, and widespread or significant capital investments require careful and collaborative planning.” Regional planning and policies must include efforts to acquire, conserve and manage long-term tidal migration pathways now. We must quickly and innovatively find ways to conserve tidal wetland migration pathways. A sense of urgency needs to be incorporated into efforts for acquisition and conservation of areas that can support lateral tidal marsh migration since those opportunities are limited, continue to be threatened by development pressure and have little regulatory protection.	No response needed
70	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Address hydrological connections	p. 16 - “In some cases, we will adapt by restoring natural wetlands to absorb more water and buffer us from storms, while in other places we will build higher protections, such as seawalls, to keep water out.” We recognize that in some situations there will be no alternative to grey infrastructure, however this should always be viewed as the last resort. Grey infrastructure, as suggested in a recent article by Stanford University’s Natural Capital Project ² , and a 2018 paper by Wang et al ³ , analyzed through modeling, the interconnectedness of the Bay’s shoreline and the ramifications of utilizing seawalls and traditional levees in one location, on other areas of the Bay. Both studies concluded that “...measures to prevent flooding along an embayment shoreline in one location or subregion may increase inundation elsewhere in the system.” [Wang et al] We strongly recommend that the Joint Platform incorporate language that acknowledges the interconnectedness of the Bay’s shoreline and identifies the potential for flood protection measures in one location of the Bay to increase the risk of flooding in other areas. We also recommend that this is an issue that should be analyzed during the permit review process and ultimately, that regional guidance be prepared to avoid unintended consequences. There is a bullet under Task 8.1 briefly mentions evaluating a project’s impacts such as “exacerbating flooding or wave erosion” on neighbors or the region, but a sentence or short discussion should be provided here, where seawalls and levees are mentioned as well.	Language updated based on comment
71	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Address hydrological connections; Incentives/regulations for participation	p. 17 “Adaptation Actions that Prepare” – In addition to the actions identified, we strongly recommend, given studies that point to the interconnectedness of the Bay’s shoreline, that regional oversight and guidance is necessary to avoid protecting one segment of the Bay’s shoreline while increasing the risk of flood inundation in other areas.	Language updated based on comment

Bay Adapt Public Comments and Response

Comment Number	Comment Type	Date Received	Commenter	Organization	Comment Summary	Detailed Comment	Response
72	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Land use and conservation	<p>“Adaptation Actions that Protect, Accommodate, Avoid or Retreat” – More emphasis should be placed on avoiding placing new development in areas at risk of flooding. It is concerning that the Executive Summary states that over the next 40 years 13,000 existing housing units are at risk of flooding (this figure seems low), but alarming that “another 70,000 new housing units will be at risk. It is extremely concerning that in addition to dealing with the challenges of protecting existing housing, development and infrastructure, new housing and development is being permitted that will put Bay Area residents in harm’s way and likely require protection in the future. This is not adaptation, this is conducting business as usual, something that should not occur in an era of rising sea levels.</p> <p>We suggest the figure that depicts adaptation/accommodation actions using “elevated structures” as an example be modified. As stated above, we strongly object to the continued permitting of new development in areas that are vulnerable to inundation as sea levels rise. If elevated structures are being used as an example of accommodation/adaptation, then it should be made clear that in addition to elevating structures, any development would need to ensure safe ingress and egress to those structures as well.</p>	No changes. The figure includes a diagrammatic sketches of a range of possible adaptation actions. Any real solution would need to be evaluated in detail, including safe ingress and egress.
73	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Details on Implementation	<p>p. 19 – “Likewise, legislators in Sacramento and Washington need to hear our collective voice loud and clear – two thirds of the State’s total sea level rise impacts will occur in the Bay Area, so our collective voice must be strong.” What are we asking Legislators for? Funding for restoration and acquisition of flood accommodation space and tidal wetlands migration pathways? Regulations to ensure that new development does not occur in areas that will be vulnerable to sea level rise and will require future protection?</p>	Comment included in Implementation Brief
74	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Tracking and sharing progress	<p>Task 1.1 mentions the development of regional and sub-regional objectives that are tied to measurable metrics. With respect to ecosystem function, it is important to avoid a snapshot in time approach to ensure we are measuring success in terms of long-term sustainability and not just what currently exists or will only exist in the short-term.</p>	Comment included in Implementation Brief
75	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Clarify language	<p>p.21 – “Action 2 Elevate communities to lead.”</p> <p>We agree with all the goals and tasks identified, but want to ensure that environmental groups will have a voice in the ongoing Bay Adapt process as well. The Joint Platform identifies three different groups – Community Based Organizations, Environmental Organizations and Advocates in the tables on pages 40-41. Is there a clear-cut distinction between these groups? If so, environmental groups are not mentioned in the text of the Joint Platform at all and only mentioned once under Task 1.1 of the tables. Environmental advocacy groups should be provided an opportunity to participate in the possible working groups as our members have intimate knowledge of the lands along the edges of the Bay and have participated in the development of the original Goals Project, the Bay Ecosystem Habitat Goals Update (BEHGU) and the Tidal Marsh Ecosystem Recovery Plan (TMERP).</p>	Comment included in Implementation Plan
76	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Education	<p>p. 23 – “Action 3 Broaden public understanding of climate change science and impacts.”</p> <p>Under the description of the benefits of the Action, the Joint Platform states, “Raises awareness of the health and future of the Bay and its resources...” We do not see this necessary component incorporated into the task descriptions. As news stories pour in from across the country, people are beginning to grasp that climate change will impact where we live and how we conduct our daily lives. And in the Bay Area residents have demonstrated a willingness to tax ourselves to support restoration of the Bay’s habitats as demonstrated by the passage of the Restoration Authority. But in order to sustain public support of funding for restoration projects and natural and nature-based solutions, we must continue to educate current and future generations about our collective responsibility of providing stewardship for the Bay. We must continue to educate decision-makers and the public about the importance of protecting ecosystems essential to the health of the Bay - ecosystems that provide benefits not only for wildlife, but also for Bay Area residents. Recently the Sierra Club 3-Chapter Committee on Sea Level Rise hosted a 3-part webinar series designed for decision-makers and the session with the highest attendance was the session that provided an introduction to tidal wetlands, the services provided by tidal wetlands, the threats posed by sea level rise and an introduction to natural and nature-based solutions. Programs such as the Mycelium Youth Network could provide a model for the development of K-12 programs that are more specific to the impacts of climate change on the Bay’s ecosystems, why that is of concern for Bay Area residents and beyond, and how we are planning for the future.</p>	Language updated based on comment

Bay Adapt Public Comments and Response

Comment Number	Comment Type	Date Received	Commenter	Organization	Comment Summary	Detailed Comment	Response
77	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Land use and conservation; Connections to existing policies	(part 1) p. 28 – “Action 5 – Align local and regional plans into a unified adaptation approach.” “Task 5.1: Provide incentives for robust, coordinated local adaptation plans.” We certainly encourage providing incentives for better planning along the edges of the Bay. Unfortunately, we remain deeply concerned that incentives in and of themselves will not halt permitting of poorly planned developments that clearly place Bay Area residents in harm’s way. Projects that will be vulnerable to the threat of sea level rise continue to be proposed and while regulations exist to hopefully deny permits that propose development in tidal flats and wetlands – such a permit application was recently submitted to the Corps of Engineers for a project in Redwood Creek – plenty of other local permits are issued for projects that will require future protection from sea level rise, but fall through federal and state regulatory gaps. A common refrain is “this project is small and won’t increase the overall impacts of sea level rise on Bay Area communities” which may or may not be true at the individual project level depending on the project’s location, but is certainly not true from a cumulative perspective. Another response is that “future flood risk is something that needs to be addressed at a regional level” and yet another is “there is no regulation saying we cannot permit development (in an area that will be vulnerable to future inundation from sea level rise).” Comments such as these highlight the concern that despite the good intentions of the Bay Adapt Joint Platform, Bay Area communities collectively are not all rowing in the same direction, and that the actions of a few may be at cross purposes or inconsistent with “regionally-appropriate strategies for protecting natural areas, etc.” With regard to the bullet that states, “Land use guidance, such as how to plan for habitat migration with sea level rise” is wholly inadequate. There needs to be more of a sense of urgency than is conveyed in this statement.	Comment included in Implementation Brief
78	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Land use and conservation; Connections to existing policies	(part 2) In regions such as the South and Central Bay, development is immediately adjacent to the Bay, salt ponds or wetlands. There are few remaining opportunities for upslope migration and those that remain are threatened by the lack of state or federal regulatory protection and tremendous development pressure. Documents such as the BEHGU, the TMERP and the San Francisco Bay Shoreline Adaptation Atlas have already identified locations that could support tidal wetlands migration. Perhaps what this bullet point is trying to convey is that there is an urgent need to identify mechanisms that will enable us to act now to protect lands that could support tidal wetlands migration as sea levels continue to rise? “Guidance on how to plan for long-term implications of sea level rise beyond current planning horizons.” This is particularly important with respect to adapting existing or planning new transit or infrastructure projects due to the length of time required for planning and the costs of design and implementation. The Joint Platform should incorporate the guidance provided in the State’s “Making California’s Coast Resilient to Sea Level Rise: Principles for Aligned State Action”: “Utilize SLR targets based on the best available science and a minimum of 3.5 feet of SLR by 2050. Develop and utilize more protective baseline 2050 and 2100 targets for road, rail, port, power plants, water and waste systems, and other critical infrastructure.” The document also states, “California’s coast faces a significant risk of experiencing SLR of up to 1.0 feet by 2030 and 7.6 feet by 2100.” To plan conservatively, the 2100 target should be utilized for road, rail, port, power plants, water and waste systems and other critical infrastructure.	Comment included in Implementation Brief
79	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Clarify language	“Task 5.2: Align state-mandated planning processes around adaptation.” We agree that cross-jurisdictional planning is desperately needed to address the “siloes scope of local plans that are often limited to jurisdictional boundaries” for the reasons stated above and because of the interconnectedness of our shorelines. The statement of the “benefits” for the environment that will occur with implementation Action 5 seems to be missing a word? Perhaps you meant to state, “Rewards planning processes that value long-term protection of Bay habitats and prioritizes natural and nature-based adaptation outcomes.” As stated above, a rewards system may simply be inadequate to ensure “long-term protection of Bay habitats...”	Language updated based on comment
80	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Clarify language	p. 30 – “Task 6.1: Expand understanding of the financial costs and revenues associated with regional adaptation.” Please clarify or consider revising the sentence, “Consider when funds may be needed as sea levels rise and impacts begin to occur.” Aren’t funds already needed to implement tidal wetlands restoration? And aren’t sea level rise resilience projects already being implemented? And aren’t sea level rise impacts already occurring?	Language updated based on comment

Bay Adapt Public Comments and Response

Comment Number	Comment Type	Date Received	Commenter	Organization	Comment Summary	Detailed Comment	Response
81	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Details on permitting efficiencies	p. 33 "Action 7 Refine and accelerate regulatory approvals processes." As described in the sidebar on this page, the BRRIT is a "multi-agency team dedicated to improving the permitting of multi-benefit habitat restoration projects and associated flood management and public access in and along San Francisco Bay." The last sentence of the sidebar raises red flags, "The BRRIT could be expanded to cover more types of projects, or a similar team could be created to handle projects that BRRIT does not consider." What additional types of projects is the Joint Platform suggesting be considered for expedited permit review? Certainly, any project that includes land development activities should not fall under the category of expedited review. In the interest of transparency, the Joint Platform should identify the additional types of projects that are being proposed for expedited permit review and constrain them to natural and nature-based solutions.	Language updated based on comment
82	Letter	9/24/21	Carin High	Citizens Committee to Complete the Refuge (CCCR) and the Sierra Club Bay Alive Committee	Incentives/regulations for participation	we deeply appreciate the inclusion of language in the Joint Platform that acknowledges and emphasizes the critical role habitats such as tidal wetlands play in restoring and protecting the ecological health of the Bay and resilience of our communities, and the threat posed by sea level rise to tidal wetlands. However, we remain concerned that an approach that relies strictly on incentives will in the end fail to protect the ecological health of the Bay and in particular the crucial tidal wetlands migration pathways essential to sustaining a healthy Bay.	Comment included in Implementation Brief
83	Letter	9/24/2021	Julia Dowell	Greenaction for Health and Environmental Justice, Bayview Hunters Point Mothers and Fathers Committee, the Richmond Shoreline Alliance and the Sunflower Alliance	Address Contamination	In the initial section of the plan entitled "Centering and protecting people, habitats and wildlife" the plan acknowledges the impacts on vulnerable communities caused by sea level rise and flooding. Included in these risks is "Exposure to toxic substances, spread of disease, worsened pre-existing health conditions" (Page 13). Recent deaths from flooding of homes and apartments underscore this risk. However, these risks are not addressed later in the plan at all. We find this omission very problematic, as exposure to toxic substances caused by sea level and groundwater rise will likely harm the health of frontline communities on the shoreline. We strongly recommend complete cleanup of toxic and radioactive waste buried at and below sea level, including open and closed Superfund-qualified sites and other contaminated sites. Such cleanups must be required in this adaptation plan in order to protect the health of shoreline communities across the Bay.	Language updated based on comment
84	Letter	9/24/2021	Julia Dowell	Greenaction for Health and Environmental Justice, Bayview Hunters Point Mothers and Fathers Committee, the Richmond Shoreline Alliance and the Sunflower Alliance	Address Contamination; Details on EJ	Action 1: Collaborate on a "One Bay" vision to adapt to rising sea levels. We support the regional approach to addressing sea level rise. However, we also recognize that there are some communities and sites around the Bay that must be assessed individually, given their particular vulnerability to sea level and groundwater rise, as well as the existence of contaminated soils on the shoreline. Two such examples are the Hunter's Point Naval Shipyard in Bayview Hunters Point and the Zeneca/Campus Bay site in Richmond. The Platform explains in Task 1.1 the intention to "Engage communities and stakeholders in envisioning a resilient future shoreline, relying on grassroots input from start to finish" (Page 19). We support engaging communities in the planning process. However, more than input, we advocate for adaptation plans to be led by frontline vulnerable communities, who will prioritize their needs and visions over those of other stakeholders. After all, these communities will be most impacted.	Comment included in Implementation Brief
85	Letter	9/24/2021	Julia Dowell	Greenaction for Health and Environmental Justice, Bayview Hunters Point Mothers and Fathers Committee, the Richmond Shoreline Alliance and the Sunflower Alliance	Details on EJ	Action 2: Elevate communities to lead. We fully support Task 2.1, which aims to "Build community capacity to influence government and support a region-wide training program led by communities and geared towards government, so that values are shifted toward place-based expertise" (Page 21) and we advocate for leadership to come from frontline communities on and near the shoreline because they will be most impacted. In particular, we want to see environmental justice communities prioritized in these leadership roles.	Comment included in Implementation Brief

Bay Adapt Public Comments and Response

Comment Number	Comment Type	Date Received	Commenter	Organization	Comment Summary	Detailed Comment	Response
86	Letter	9/24/2021	Julia Dowell	Greenaction for Health and Environmental Justice, Bayview Hunters Point Mothers and Fathers Committee, the Richmond Shoreline Alliance and the Sunflower Alliance	Tracking and sharing progress	Action 3: Broaden public understanding of climate change science and impacts. We support the plan to “Tell local and regional stories about people and places adapting to climate change” and “Weave climate literacy into school programs.” (Page 23). However, we need communities to not only share their “stories on local successes and hopeful narratives” (Page 23), as the plan suggests, but we need communities to share their stories of concern, risk, needs, and loss in order to center these narratives and base future adaptation planning on mitigating these challenges.	Language updated based on comment
87	Letter	9/24/2021	Julia Dowell	Greenaction for Health and Environmental Justice, Bayview Hunters Point Mothers and Fathers Committee, the Richmond Shoreline Alliance and the Sunflower Alliance	Tracking and sharing progress; Address Contamination; Address hydrological connections	Action 4: Base plans and projects on the best science, data, and knowledge. We support Action 4 and the sub-tasks related to using the best and most up-to-date science to address sea level rise, especially “Enhanced regional flood modeling related to multiple hazards (such as groundwater, watershed, riverine/tidal, subsidence, erosion).” However, it is imperative to include the impacts of this regional flooding, including groundwater rise, on contaminated sites across the Bay in these mapping and analysis efforts. These data and mapping models should include current and previous contaminated sites- including those sites that are “closed” but contain “capped” hazardous and radioactive waste buried at or below sea level. We also fully support Task 4.2 to “Make scientific data, information, and guidance easier to access and use.” In order to make these data complete and understandable to the public, local, regional, and State agencies must be required to work together to share their data regarding contaminated sites across the Bay and how these sites may be impacted by sea level and groundwater rise.	Comment included in Implementation Brief
88	Letter	9/24/2021	Julia Dowell	Greenaction for Health and Environmental Justice, Bayview Hunters Point Mothers and Fathers Committee, the Richmond Shoreline Alliance and the Sunflower Alliance	Details on EJ; Details on permitting efficiencies	Action 7: Refine and accelerate regulatory approvals processes. In Task 7.1, it is unclear how “equitable multi-benefit projects” will truly create equitable outcomes in shoreline communities. These regulatory processes and adaptation planning need to be centered in environmental justice principles. In addition, Task 7.2, which aims to “Tackle environmental regulations and policies that slow down progress on projects” (Page 34), is concerning as this could be interpreted as less stringent environmental regulatory oversight. Rather, these environmental regulations and policies need to be centered on environmental justice and community needs.	Language updated based on comment
89	Letter	9/24/2021	Julia Dowell	Greenaction for Health and Environmental Justice, Bayview Hunters Point Mothers and Fathers Committee, the Richmond Shoreline Alliance and the Sunflower Alliance	Details on EJ	Action 8: Fund and facilitate faster adaptation projects. We fully support Action 8, however, in the effort to facilitate faster construction of nature-based projects, this effort must include requirements to limit gentrification and prioritize the health, safety, and wellbeing of environmental justice communities on the shoreline.	Comment included in Implementation Brief

Bay Adapt Public Comments and Response

Comment Number	Comment Type	Date Received	Commenter	Organization	Comment Summary	Detailed Comment	Response
90	Letter	9/24/2021	Julia Dowell	Greenaction for Health and Environmental Justice, Bayview Hunters Point Mothers and Fathers Committee, the Richmond Shoreline Alliance and the Sunflower Alliance	Tracking and sharing progress; Details on EJ; Address contamination	Action 9: Track and report progress to guide future actions. In addition to the tasks outlined in Action 9, it is also important to collect and reflect on qualitative data, such as narratives and feedback from surrounding communities, when determining the efficacy of a project and to use this feedback to guide future actions. Ultimately, this Joint Platform must take into account how sea level rise and groundwater rise will impact contaminated sites on the shoreline across the Bay and how communities surrounding these sites will be impacted. The cleanup of these contaminated sites and the health of these shoreline communities must be prioritized in this adaptation planning. Environmental justice communities near contaminated sites on the shoreline must be centered in this plan, as they face the cumulative impacts of sea level rise, ground water rise, risk of contamination and pre-existing health conditions. Thank you.	Language updated based on comment
91	Letter	9/24/21	Lee Huo	Bay Area Metro/Bay Trail Planner	Land use and conservation	Although the descriptive text for the Bay Adapt Joint Platform mentions “shoreline access” and “public access” once each, shoreline access, public access, and shoreline recreation are not clearly identified as a regional priority in adaptation anywhere in the document. Shoreline public access is a primary mandate of BCDC through the landmark McAteer-Petris Act that has opened up countless stretches of Bay Shoreline for public access and recreation that have contributed significantly to the quality of life and livability of the Bay Area region. In general, language identifying shoreline public access as a regional priority in adaptation should be added to and discussed within the Joint Platform document.	Language updated based on comment
92	Letter	9/24/21	Lee Huo	Bay Area Metro/Bay Trail Planner	Land use and conservation	A few specific areas within the existing text where shoreline public access language would make sense include the third paragraph under Task 1.1. There’s an opportunity here to specifically call out shoreline public access as a regional priority. The other is under Task 8.1 in the third bullet point, where shoreline public access could be incorporated in this text when discussing the evaluation of project impacts.	Language updated based on comment
93	Survey	9/25/21	Jeb Del Mundo		Communication and Collaboration	Action 2: I am always looking for an opportunity to interact with local communities in San Francisco.	No response needed
94	Survey	9/25/21	Jeb Del Mundo		Education	Action 3: As a Environmental studies major born in San Francisco, it is especially relevant to me how climate change will impact the bay area.	No response needed
95	Survey	9/25/21	Jeb Del Mundo			Action 4: This will help further my studies as an environmental studies major.	No response needed
96	Survey	9/25/21	Kevin Ma		Education	Action 1: Good to ensure everyone has a single basis to work off of	No response needed
97	Survey	9/25/21	Kevin Ma		Details on EJ	Action 2: Would be good to also encourage the creation new CBOs in areas that might be underrepresented	Comment included in Implementation Brief
98	Survey	9/25/21	Kevin Ma		Education	Action 3: This would need to go to the school board level, but I’d like such climate adaptation programs to be included early on in people’s science classes, rather than being an optional after-school event. Also would be nice to partner with local businesses working on climate adaptation, to provide people an understanding of what jobs are available locally.	Language updated based on comment
99	Survey	9/25/21	Kevin Ma		Details on Implementation	Action 4: Good to spread information, but there also should be points made clear where policy can step in when the scientific research is lacking in a particular area.	Comment included in Implementation Brief
100	Survey	9/25/21	Kevin Ma		Incentives/regulations for participation	Action 5: Planning might need to be pushed harder, if local jurisdictions are shirking off their responsibility or otherwise delaying the whole process.	Comment included in Implementation Brief
101	Survey	9/25/21	Kevin Ma		How to prioritize	Action 6: Probably the most important, given the general size of actions necessary.	No response needed
102	Survey	9/25/21	Kevin Ma		Tracking and sharing progress	Action 9: Without data, we can’t tell easily whether we’re on the right track	No response needed
103	Survey	9/25/21	Robin Freeman	David Brower, Ronald Dellums Institute for Sustainable Policy Studies	Communication and Collaboration	Action 1: Create opportunities for diverse stakeholders to learn about each other and have conversations.	Language updated based on comment
104	Survey	9/25/21	Robin Freeman	David Brower, Ronald Dellums Institute for Sustainable Policy Studies	Tracking and sharing progress	Action 2: Hyper local, site specific knowledge of situations and conditions gives the richest information base and creates responsible jobs within the communities as they identify and learn how to address problems.	Comment included in Implementation Brief
105	Survey	9/25/21	Robin Freeman	David Brower, Ronald Dellums Institute for Sustainable Policy Studies	Tracking and sharing progress	Action 3: Every level of inclusive information from casual observer to graduate level will be useful.	Language updated based on comment

Bay Adapt Public Comments and Response

Comment Number	Comment Type	Date Received	Commenter	Organization	Comment Summary	Detailed Comment	Response
106	Survey	9/25/21	Robin Freeman	David Brower, Ronald Dellums Institute for Sustainable Policy Studies	Communication and Collaboration	Action 4: Every level of inclusive information from casual observer to graduate level will be useful.	Language updated based on comment
107	Survey	9/25/21	Robin Freeman	David Brower, Ronald Dellums Institute for Sustainable Policy Studies	Communication and Collaboration	Action 5: Hold conversations at all scales from neighborhoods to regional.	Comment included in Implementation Brief
108	Survey	9/25/21	Robin Freeman	David Brower, Ronald Dellums Institute for Sustainable Policy Studies	Details on funding	Action 6: Great to get a realistic picture of the actual costs involved so very large non-necessary budgets like nuclear weapons are seen as budget threats in addition to their obvious dangers.	Comment included in Implementation Brief
109	Survey	9/25/21	Robin Freeman	David Brower, Ronald Dellums Institute for Sustainable Policy Studies	Details on Implementation	Action 7: Have all the stakeholders affected by the regulatory system work on a collaborative plan as was pioneered in some European countries where broad benchmarks were set by all the players and then each sector developed ways to meet them.	Comment included in Implementation Brief
110	Survey	9/25/21	Robin Freeman	David Brower, Ronald Dellums Institute for Sustainable Policy Studies	Education	Action 8: Link this with education and planning to prepare scaled shovel ready projects.	Language updated based on comment
111	Survey	9/25/21	Robin Freeman	David Brower, Ronald Dellums Institute for Sustainable Policy Studies	Tracking and sharing progress	Action 9: Use multiple metrics including informal ones.	Comment included in Implementation Brief
112	Letter	9/27/21	Hannah Doress	County of San Mateo Office of Sustainability	Need additional action from private sector	Missing or not fully addressed in the Plan: An engagement strategy to include the participation of private landowners on the shoreline, businesses and the tech community in adaptation efforts. Companies like Facebook and Google have waterfront properties in the Bay and are investing billions in new coastal developments in areas that will be affected by sea level rise, and they know of the flood risks. Local governments alone can't afford the hundreds of millions of dollars that massive levee projects cost, and these projects will protect those private waterfront properties as well. There is a need to include the private sector in the mix when planning how to finance the improvement of existing levees and flood protection systems to mitigate the flooding. Another strategy will be to encourage them to include nature-based solutions in their development plans and support restoration efforts around the Bay.	Comment included in Implementation Brief
113	Letter	9/27/21	Hannah Doress	County of San Mateo Office of Sustainability	Details on EJ	Missing or not fully addressed in the Plan: The effort to engage East Palo Alto and Vallejo communities seems like a good model. Will you go back to those communities to see if the joint platform aligns with their goals? How will these types of engagements be integrated into your core functions and be funded? For a Bay Area-wide effort we would recommend more communities be engaged, especially those you identified as highest risk: East Palo Alto, San Rafael's Canal District, Vallejo, San Francisco's Bayview, West Oakland and San Jose's Alviso. What kinds of checks and balances do you plan to assure "no voice goes unheard"?	Comment included in Implementation Brief
114	Letter	9/27/21	Hannah Doress	County of San Mateo Office of Sustainability	Details on funding; How to prioritize	Missing or not fully addressed in the Plan: Action 2: Elevate communities to lead what and how? Adequate funding in Task 2.2 will be essential. How will increased funding and improved communication change the process and outcomes for low income, socially vulnerable communities and communities of color? Action 2 (or another action) should prioritize addressing the potential interaction of flooding with hazardous waste sites and chemical storage in low lying communities.	Language updated based on comment
115	Letter	9/27/21	Hannah Doress	County of San Mateo Office of Sustainability	Watershed-wide connections (Upstream & Coastal)	Missing or not fully addressed in the Plan: Action 4: Add ground-truthing – communities know where water goes and should be part of assuring data is valid and supporting Task 4.1.	Language updated based on comment
116	Letter	9/27/21	Hannah Doress	County of San Mateo Office of Sustainability	Tracking and sharing progress	Missing or not fully addressed in the Plan: Action 9: add Task 9.3 Assure follow on funding for successful pilots to be replicated, continued and implemented.	Comment included in Implementation Brief

Bay Adapt Public Comments and Response

Comment Number	Comment Type	Date Received	Commenter	Organization	Comment Summary	Detailed Comment	Response
117	Letter	9/27/21	Hannah Doress	County of San Mateo Office of Sustainability	How to prioritize; Details on EJ	Missing or not fully addressed in the Plan: All Actions and Tasks: For the whole effort – there is a need for prioritization processes that give higher priority to communities with Environmental Justice / water and land pollution challenges and chronic underinvestment in infrastructure and which meaningfully involves the affected communities in the process so the results benefit those communities.	Language updated based on comment
118	Letter	9/27/21	Hannah Doress	County of San Mateo Office of Sustainability	Clarify language	Would benefit from revision: Page 9: I'm not sure the parallel between low income / communities of color and wildlife is working. It could play into implicit bias related to the perceived helplessness of the communities and long-held stereotypes about BIPOC people. The case is not as well made for wildlife in this section and setting up a poor wildlife vs. the money-focused farm won't resonate in agricultural communities, especially to struggling small farmers and farmworkers. The discussion of sediments will be over many people's heads, could it be more accessible? Page 10: elevate the communities most affected by sea level rise and increase decision-making power in them (only in their communities?)	Bay Adapt aims to prioritize protection of both nature and humans. Language updated on sediment discussion.
119	Letter	9/27/21	Hannah Doress	County of San Mateo Office of Sustainability	Details on Implementation; Communication and Collaboration	How will this help our work at OOS? Provide guidelines for regional collaboration and coordination, and a needed baseline agreement on actions necessary to protect life and property from rising sea levels. Provide momentum for best practices, funding and equity and inclusion.	Comment included in Implementation Brief
120	Letter	9/27/21	Hannah Doress	County of San Mateo Office of Sustainability	Details on EJ; Details on funding	How will this benefit socially vulnerable community members? Provide best practices and expectations on how to assure that traditionally underserved low income and communities of color have real agency in defining the future of their communities and also have agency in decision-making. Frequently these voices are ignored or sidelined during processes, engaged superficially, and not included at decision-time. Decisions are framed narrowly for the convenience of other stakeholders and don't include the breadth of community concerns about flooding mitigation, which can include displacement concerns, concerns about chronic underinvestment in infrastructure, and safety communications, potential impact to hazardous waste sites and evacuation concerns. Task 7.1 incentivizes equitable projects. Financial incentives are needed also. Involvement of affected communities to define equitable and multi-benefit projects is needed. There are many multi-benefit projects that are not desired by the community.	Many examples of best practices are already included or were added.
121	Letter	9/27/21	Hannah Doress	County of San Mateo Office of Sustainability	Details on Implementation; Details on EJ	Does this draft plan effectively operationalize equity and inclusion? How is equitable defined and who will decide what is equitable and how to fund equitably? (page 13). What happens when communities facing inequities don't agree with the definition and funding? Action 1: how will community leaders from the high risk communities identified (East Palo Alto, San Rafael's Canal District, Vallejo, San Francisco's Bayview, West Oakland and San Jose's Alviso) be involved in the "one Bay" vision and legislative agenda? How will the effort address power, capacity, funded time and other differentials between the leaders involved?	Comment included in Implementation Brief