

CALIFORNIA COASTAL COMMISSION

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June 1, 2017

Metropolitan Transportation Commission
Sent via email to [eircomments@mtc.ca.gov]

Subject: SCH# 2016052041. Comments on the Draft EIR for Plan Bay Area 2040 – the Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS)

Dear Mr. Noetling:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Metropolitan Transportation Commission's (MTC) San Francisco Bay Area Regional Transportation Plan (RTP) and Sustainable Community Strategy (SCS). Plan Bay Area 2040 will update the RTP/SCS and provide a long-range plan that balances transportation and housing needs with other economic and environmental goals, and identifies regional planning needs, priorities, and funding. The DEIR evaluated three different land use and transportation scenarios that were developed by the MTC and the Association of Bay Area Governments (ABAG) to illustrate the potential effects these different strategies would have on reaching the region's adopted goals and performance targets.

Given the California Coastal Commission's mandate to protect coastal resources through planning and regulation of the use of land and water within the Coastal Zone, we requested, through our comments on the notice of preparation for the EIR, that EIR consider, analyze, and address topics including consistency with relevant Local Coastal Programs, sea level rise, and possible impacts to public access. Although the DEIR considers both LCPs and sea level rise, Coastal Commission staff believes that both of these topics should be expanded to better address important issues, as explained below. In addition, we request that possible impacts to public access be analyzed as initially requested.

- 1) **California Coastal Act and Local Coastal Programs (LCPs).** Although the DEIR notes that the Coastal Act and certified LCPs are the applicable standard of review for project in the Coastal Zone, the EIR did not include an evaluation of the consistency with these relevant documents for the proposed land use and transportation scenarios. We suggest adding a table or discussion that identifies Coastal Act policies and LCP standards applicable to the projects. For example, regarding the sea level rise analysis in particular, a section that lays out the relevant LCP policies could be added that is similar to the section of relevant county General Plan policies that starts on page 2.5-26.
- 2) **Sea Level Rise.** Overall, we feel that the section on sea level rise could benefit from some additional detail and some clarifications. Most critically, the DEIR notes that implementation of the proposed Plan could result in an increase in transportation and land use development within areas regularly inundated by sea level rise by midcentury, stating

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that these impacts, or risks, are unavoidable and will be mitigated on a project-level through adaptation strategies. However, there does not appear to be a thorough discussion regarding alternatives that could avoid or even minimize risks associated with sea level rise. Thus, the analysis falls short of the Coastal Act requirement that new development be sited and designed in such a manner to avoid or minimize risks from coastal hazards over its anticipated lifetime. Although the Commission recognizes that in some cases it may not be possible to completely avoid coastal hazards, it is critical that a range of alternatives be considered and analyzed in the early planning stages so that sea level rise can be holistically and proactively addressed rather than simply relying on ad-hoc, project-by-project adaptation measures. Please provide additional detail regarding opportunities to avoid or minimize risks associated with sea level rise at this region-wide planning stage in addition to the project-specific adaptation measures included in the Appendix.

Please also make the following additions or clarifications:

- As requested in our previous comment letter, please provide detail on the extent to which the various scenarios would or could alleviate impacts to existing transportation networks and housing stocks as sea levels rise.
- Provide information regarding state/regional projections of sea level rise through the year 2100 (in addition to the global projections that are already included, pg. 2.5-6). We suggest referencing both the projections from the 2012 NRC report, as directed by the State Sea Level Rise Guidance Document, as well as the April 2017 update, [Rising Seas in California](http://www.opc.ca.gov/webmaster/ftp/pdf/docs/rising-seas-in-california-an-update-on-sea-level-rise-science.pdf) (<http://www.opc.ca.gov/webmaster/ftp/pdf/docs/rising-seas-in-california-an-update-on-sea-level-rise-science.pdf>). Including this additional detail provides important context for understanding that although the planning horizon for Plan Bay Area is only through 2040, sea levels will continue to rise. Thus the transportation decisions that are made today have important short and long-term consequences.
- The paragraph regarding the Coastal Commission's work as it relates to sea level rise states that "the agency is currently assessing how best to address sea level rise and other challenges resulting from climate change". However, the Commission has long addressed sea level rise within the context of ensuring that development will be safe from coastal hazards for its anticipated life as required by the Coastal Act. In addition, the Commission unanimously adopted its [Sea Level Rise Policy Guidance](https://www.coastal.ca.gov/climate/slrguidance.html) (<https://www.coastal.ca.gov/climate/slrguidance.html>) in August 2015, which includes information and recommendations for how to address sea level rise in LCPs and Coastal Development Permit applications within the context of the Coastal Act. The Commission has also been actively working with counties and cities in the Bay Area and throughout the State to update their Local Coastal Programs to better address sea level rise.
- The DEIR references ongoing sea level rise work being completed by San Francisco, Solana, and Marin Counties. San Mateo County also has a sea level rise program, [Sea Change SMC](http://seachangesmc.com/) (<http://seachangesmc.com/>), which recently completed a draft vulnerability assessment, as does the City of Half Moon Bay ([Plan HMB](#));

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<http://www.planhmb.org/>). In addition, the City of Pacifica received a grant from the Coastal Commission to undertake sea level rise planning work.

- 3) **Public Access.** We continue to request that the EIR evaluate the proposed project and alternatives for consistency with the public access policies of the California Coastal Act, particularly how the project would maximize access to the coast, including options for non-motorized, bicycle, and pedestrian routes and related amenities throughout the region.

In addition, while the California Coastal Act is listed in the 'Regulatory Setting' for Land Use, Climate Change and Biological Resources, it should also be listed as applicable to Visual Resources, Cultural Resources, and Public Services and Recreation.

If you have any questions, please do not hesitate to contact me.

Sincerely,



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