

# San Francisco Bay Conservation and Development Commission

375 Beale Street, Suite 510 San Francisco, California 94105 tel 415 352 3600 fax 415 352 3606

State of California | Gavin Newsom – Governor | [info@bcdc.ca.gov](mailto:info@bcdc.ca.gov) | [www.bcdc.ca.gov](http://www.bcdc.ca.gov)

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*Via electronic mail only: [info@planbayarea.org](mailto:info@planbayarea.org) and [tmcmillan@bayareametro.gov](mailto:tmcmillan@bayareametro.gov)*

Metropolitan Transportation Commission/Association of Bay Area Governments

Attn: Therese McMillan, Executive Director

Attn: Draft Plan Bay Area Comments

375 Beale Street, Suite 800

San Francisco, CA 94105

**SUBJECT: BCDC Comments on Draft Plan Bay Area 2050**

Dear Ms. McMillan:

Thank you for the opportunity to comment on Plan Bay Area 2050 (PBA). Plan Bay Area, as a state-mandated transportation and land use plan, plays a critical role in the future of the Bay Area. Land use, housing, and transportation will not only shape the success and prosperity of the Bay Area, but also play significant roles in determining the region's resilience to future sea level rise (SLR).

The San Francisco Bay Conservation and Development Commission (BCDC) is a State planning and regulatory agency with permitting authority over San Francisco Bay, the Bay shoreline, and Suisun Marsh, as established in the McAteer-Petris Act and the Suisun Marsh Preservation Act. BCDC, the nation's first coastal management agency, continues to lead the Bay Area's development of a regional strategy to protect people, habitat, and commerce in light of rising sea level. Additionally, BCDC establishes land use policies for the Bay as a resource and for development of the Bay and its shoreline in the Bay Plan, which provides the basis for the Commission's review and actions on proposed projects. BCDC's policies form the San Francisco Bay segment of the California coastal zone program, approved by the National Oceanic and Atmospheric Administration (NOAA) Office for Coastal Management pursuant to the federal Coastal Zone Management Act.

Staff at BCDC commend MTC/ABAG for Plan Bay Area 2050, which presents a compelling, forward-thinking vision to improve the region's resilience to climate change. As acknowledged in the plan, [Bay Adapt](#) is a BCDC-led process to gain consensus on the actions necessary to protect people and the natural and built environment from rising sea levels. Collaboratively developed with a diverse leadership advisory group and hundreds of stakeholders, Bay Adapt spotlights the range of actions that many stakeholders in the region will need to undertake to facilitate the community involvement, plans, projects, and funding that will help the region



achieve its adaptation goals. Alignment between Plan Bay Area 2050 and Bay Adapt is important to secure the region's long-term outcomes and prepare its residents and natural habitat for climate change.

BCDC Staff are very pleased that PBA has included sea level rise scenarios in the PBA planning process and acknowledge that sea level rise will significantly impact the region's quality of life by 2050. Staff are equally pleased that adapting to sea level rise has elevated to be addressed by its own strategy. Staff greatly valued the opportunity to work closely with MTC/ABAG to shape Horizon and Plan Bay Area 2050, that MTC/ABAG has leveraged the work of BCDC's Adapting to Rising Tides (ART) program, and that MTC/ABAG have been a close partner in the development of Bay Adapt, and we look forward to continuing and deepening this partnership.

As local governments and regional and state agencies move forward on adaptation together, MTC/ABAG and Plan Bay Area play a critical role in guiding and shaping this initiative. Adapting to climate change will require an all-agency approach, transparent decision-making processes throughout the region, and embracing uncertainty at the local and regional levels. Close coordination and partnership between and among local and regional agencies are essential to create and implement solutions that no one entity can undertake alone.

BCDC has long been a regional leader in adaptation planning through its Bay Plan Climate Change Policies and the ART program. The Bay Plan's Climate Change policies call for BCDC to work with key partners, including MTC/ABAG, on developing a sea level rise adaptation strategy for the region. As exemplified by BCDC's facilitation of the Bay Adapt process, we will continue to lead the collaborative implementation of Bay Adapt. Staff are thrilled that different agencies, including MTC/ABAG, have stepped up as leaders and collaborators to plan for region-wide adaptation and implementation of Bay Adapt and look forward to continuing those collaborations and partnerships to ensure that the region adapts equitably, flexibly, and transparently.

Below are specific suggestions on the Plan Bay Area 2050 draft for your consideration.

### **Integration of Sea Level Rise into other parts of Plan Bay Area**

While the shoreline protection outlined in EN1 is critical for sea level rise adaptation, we encourage the inclusion of sea level rise considerations in other strategies as well. Sea level rise is deeply interconnected with the future of housing, transportation, and the economy as well as the environment, and should be acknowledged and integrated into these topic areas to ensure their success. For example, highlight the connection between SLR protection and housing preservation, such as in strategy H2, and include "protection" in strategies that focus on retention, investment, and restoration in housing or infrastructure.

### **"Adapt to sea level rise" Strategy**

The intention of this strategy is critical for the well-being of the region. However, we want to ensure that it is clear that this is a collaborative effort that regional planning will need to marry local action to ensure the desired outcomes. Moving forward, the language used to describe

and implement this strategy should reflect that the actual protection is not coming solely from MTC/ABAG but by a myriad of stakeholders, in particular local jurisdictions and infrastructure owners.

Staff greatly appreciate that PBA describes, and the map illustrates, a range of both green and grey strategies, and that EN1 articulates additional support to vulnerable populations. Prioritizing the environment and vulnerable communities is of high importance in Bay Adapt and we appreciate the alignment in values and goals.

Staff also appreciate the sidebar on page 93 devoted to Bay Adapt and feel that it is very helpful in reiterating our shared commitment to collaboration and plan alignment. Staff would like to provide some specific comments on wording to ensure clarity. For example, we suggest explaining how the Implementation Plan supports Bay Adapt actions and how the agencies will work together on mutual implementation to advance both the strategies in PBA and actions in Bay Adapt concurrently.

On Page 91, the statement “Coordinated action at the regional level is needed to adapt to sea level rise and protect homes, businesses and transportation corridors” should also include the need to protect and/or aid in the adaptation of natural resources from sea level rise.

### **Implementation Plan**

While MTC/ABAG’s leadership is critical to Bay Area adaptation, we recommend that MTC plays a partner or co-lead role with BCDC in task EN1. As demonstrated through the Bay Adapt process, adapting to sea level rise will require many agencies to work together. BCDC’s leadership on facilitating regional dialogues around sea level rise, such as Bay Adapt, and its role as the region’s coastal management agency, make it an appropriate leader for this task. That said, MTC/ABAG has a critical role to play in funding, technical assistance, long range visioning, and plan integration. We are grateful that MTC/ABAG has stepped forward to provide collaborative leadership in these areas.

MTC/ABAG is a critical partner in the Bay Adapt Leadership Advisory Group, its working groups, and beyond. The Implementation Plan would be strengthened by explicitly acknowledging that more detailed implementation of the “Adapt to SLR” Strategy is contained within the Bay Adapt Joint Platform. The Bay Adapt guiding principles, nine actions, and 21 tasks provide a comprehensive framework for the Bay Area to use to adapt to sea level rise and have been collaboratively developed with the leadership of private, public, non-profit and community leaders — including those from MTC/ABAG.

### **Additional Comments**

Staff encourage the explicit mention of resilience and/or sea level rise adaptation in the Guiding Principles, as there is no mention of protection or safety from SLR. We also suggest that, as MTC/ABAG solidifies and evolves growth geographies, such as PPAs, PDAs, and PCAs, we compare the geographies in BCDC’s San Francisco Bay Plan, such as Priority Use Areas, to ensure that the land use designations are aligned.

Thank you again for all your hard work on this plan and on advancing adaptation and we look forward to an ongoing and deepening partnership as leaders in this arena.

Sincerely,



LAWRENCE J. GOLDZBAND  
Executive Director

LG/DB/rc

cc: Ms. Alix Bockelman, MTC, [abockelman@bayareametro.gov](mailto:abockelman@bayareametro.gov)  
Mr. Brad Paul, MTC, [bpaul@bayareametro.gov](mailto:bpaul@bayareametro.gov)  
Mr. Matt Maloney, MTC, [mmaloney@bayareametro.gov](mailto:mmaloney@bayareametro.gov)