



10 August 2020

Association of Bay Area Governments &
Metropolitan Transportation Commission
Bay Area Metro Center
375 Beale Street
San Francisco 94105

in care of: info@planbayarea.org

Re: Additional comments on draft Blueprint, Plan Bay Area (PBA) 2050

To Whom It May Concern:

The Sierra Club thanks you for the opportunity to respond to the Plan Bay Area 2050 Blueprint and Strategies documents. You have already received a letter from the Sierra Club regarding these documents that addresses many of the issues presented in the Blueprint and Strategies. This addendum to that letter addresses solely the issue of sea level rise and how we think Plan Bay Area 2050 should address issues associated with that impending crisis.

As you know, the Ocean Protection Council, together with other entities, recently released a set of Principles for how local governments and other agencies should approach the issue of sea level rise. One of the principles states that all planning efforts should "...Utilize SLR targets based on the best available science and a minimum of 3.5 feet of SLR by 2050..." (http://www.opc.ca.gov/webmaster/_media_library/2020/05/State-SLR-Principles_FINAL_April-2020.pdf).

The impacts of this significant increase in sea level will be further exacerbated by the increase in the number of extreme storms that we now experiencing. Additionally, every-day high tides as well as King Tides will also add substantial height increases well above the Bay's basic increase of 3.5-feet. This will result in an increased likelihood of flooding or permanent inundation of shoreline communities and infrastructure. Our previous letter addressed these community and infrastructural impacts.

However, the impacts of sea level rise (and corresponding elevation rise of San Francisco Bay) extend beyond those to our communities and infrastructure. The Bay itself is a natural resource of international ecological significance, in large part due to its

extensive shallow water habitats such as mudflats (tidal flats), tidal marshes and transition zones. These habitats are essential for sustaining the great diversity of life that is dependent upon the Bay. For example, the Western Shorebird Reserve Network has identified San Francisco Bay as a shorebird habitat of hemispheric importance. Many other waterbird species, as well as fish and invertebrates, all thrive on these shallow water habitats.

Sea level rise threatens to drown these habitats and make the Bay a dramatically much less diverse and productive aquatic ecosystem, as well as threatening to release the CO₂ sequestered by the Bay's tidal marshes. Plan Bay Area 2050 can and should play an important role in preserving these resources. The draft Strategies and Blueprint are unfortunately silent on these issues but nonetheless Plan Bay Area 2050 does have some important and effective tools to address these issues.

We believe that amending one of the Environmental Strategies would be a good start in addressing this issue. We suggest the following:

Adapt to Sea Level Rise. Protect shoreline communities affected by sea level rise, prioritizing areas of low costs and high benefits and providing additional support to vulnerable populations **while also protecting valuable shoreline and extensive wetland habitats, prioritizing nature-based solutions to reduce flood-risk wherever possible.**

With that as a strategy, Priority Development Areas (PDAs) provide an important tool for this purpose. Recognizing that the unavoidable extraordinary rise of Bay waters will, and already does, threaten our shoreline communities, it is clear that allowing unchecked new shoreline development is untenable. New criteria for PDAs should be developed for proposed new development in areas that are either currently exposed to or will be exposed to significant flood risk from sea level rise within the 30–50 year life span of these buildings and infrastructure. In particular, we strongly encourage Plan Bay Area 2050 to incorporate the policies of the San Francisco Bay Conservation and Development Commission that expressly discourage new development in undeveloped areas containing existing wildlife habitat, or that have the potential for significant habitat restoration:

To address the regional adverse impacts of climate change, undeveloped areas that are both vulnerable to future flooding and currently sustain significant habitats or species, or possess conditions that make the areas especially suitable for ecosystem enhancement, should be given special consideration for preservation and habitat enhancement and should be encouraged to be used for those purposes. (BCDC Climate Change Policy #4, adopted in October 2011)

Many of these areas are specifically highlighted in the San Francisco Bay Shoreline Adaptation Atlas, which provides location-specific recommendations for nature-based flood control strategies. We encourage Plan Bay Area 2050 to closely study and incorporate the recommendations of the San Francisco Bay Shoreline Adaptation Atlas when considering PDAs. This will help ensure that the Plan Bay Area 2050 supports

(and does not directly contradict) the region-wide effort to advance the resilience of San Francisco Bay and Bay shoreline communities to sea level rise.

Priority Conservation Areas (PCAs) provide another tool to achieve the goal of preserving the health of San Francisco Bay and its shoreline. Criteria for PCAs should be amended to encourage the alignment of PCAs with shoreline areas that will be inundated with a 3.5-foot sea level rise. These criteria should incorporate the strategies of the San Francisco Bay Shoreline Adaptation Atlas, San Francisco Bay Habitat Goals Report Update, and additional relevant reports and recommendations by the scientific community and natural resource managers, regarding the protection of, and climate resilience of, San Francisco Bay. The benefits of such shoreline conservation and restoration are manifold:

- Protection of open space and improved wildlife habitat and resiliency allows shallow water habitats to extend landward as the bay rises.
- Restoration of wetlands will help meet GHG reduction targets (you acknowledge that the current plan's goals have not been met) through wetlands' ability to sequester carbon.
- Minimizing future government expenditures on protecting additional infrastructure from sea level rise—allowing already developed areas, particularly in Communities of Concern, to get funding priority.
- Natural flood control from mudflats and wetlands reduces the need and cost for expensive shoreline armoring as sea levels continue to rise.

The Sierra Club believes that Plan Bay Area 2050 must address the need to preserve San Francisco Bay itself, both as an international aquatic resource and as a key component of the quality of life of regional residents.

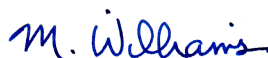
Sincerely,



Steve Birdlebough
Redwood Chapter & Sierra Club California Executive Committee



Michael J. Ferreira
Loma Prieta Chapter Executive Committee



Matt Williams
San Francisco Bay Chapter & Sierra Club California Executive Committee