



San Francisco Bay Conservation and Development Commission
375 Beale Street, Suite 510
San Francisco, CA 94105

October 18, 2024

RE: Public Comment on BCDC's Regional Shoreline Adaptation Plan

Dear Bay Conservation & Development Commission,

Thank you for your work on the Regional Shoreline Adaptation Plan. The RSAP is a sophisticated and complex document covering a broad range of goals that will guide future sea level rise adaptation practices in our region and beyond. The document recognizes tradeoffs, competing interests, and the complex policy environment and is a critical first step for regional coordination and collaboration.

SPUR works to create an equitable, sustainable, and prosperous region by balancing the region's housing, transportation, land use, economic growth, sustainability, and hazard resilience needs. The RSAP's One Bay Vision and Strategic Regional Priorities reflect the values of SPUR. We support the document's emphasis on community engagement, nature-based solutions, and the ways in which climate change and sea level rise spotlight our interconnectedness and reliance on each community and jurisdiction's capacity to adapt and thrive. The RSAP reflects intentionality in the next phase of our regional planning efforts in response to climate change.

Thank you for the opportunity to participate in the public comment process and contribute to finalizing this important guidance document. Please see our recommendations below, SPUR and Greenbelt Alliance look forward to continuing to work with BCDC on this effort.

Regional Shoreline Adaptation Plan Document Update Feedback & Recommendations:

1. **Housing & Displacement:** We appreciate the RSAP's goal to plan new and re-development projects that ensure community safety, equity, and Bay ecological health while considering the long-term vitality of our shorelines and communities. To advance the strategic regional priorities of safe growth and reducing involuntary displacement, we suggest these amendments:
 - a. *Emphasize that the adaptation strategy of "avoid" must align with regional housing needs:* Expanding development into increasingly vulnerable areas, especially to multiple hazards, will likely expose more people and structures to risk. Building new structures in high-risk or very-high-risk areas should be avoided in favor of prioritizing housing and job growth in safer, more insurable locations with existing infrastructure to accommodate new residents and workers. There are many infill areas throughout the Bay Area that are well-suited for housing development, the region does not need to place new housing development on currently undeveloped high-risk sites that would be better suited as public open space or space for natural ecosystems restoration. Still when implementing an "avoid" strategy, subregional plans must balance actions to ensure that there is no net loss of planned housing (see Recommendation 7 in SPUR's [Safety First Report](#) and SPUR's [Regional Strategy](#)).
 - b. *Include manufactured home parks (MHPs) in the list of required assets to assess in sections 2.3.1 and 2.3.3:* MHPs are critical because 1.) they are an essential source of affordable

housing and home ownership, and 2.) There are a number of these communities [located along the Bayshore in flood zones](#) (ex. South Bay Mobile Home Park, Belmont Trailer Park), 3.) MHPs [are often overlooked](#) in planning efforts.

2. **Groundwater Rise & Combined Flood Risks:** The RSAP effectively acknowledges the risk of shallow groundwater rise across the region, and we look forward to the updated ART Flood Explorer incorporating groundwater rise. Still, we recommend that BCDC's flood mapping tool incorporate projections of flood extents in the case of overlapping or simultaneous coastal flood events. Using flood overlays without acknowledging combined flood risk may lead to a subregion underestimating flood hazards, which could significantly change their adaptation approach.
3. **Shoreline Contamination Risk:** We appreciate the call to action in the RSAP for contaminated site clean-up along the shoreline to further this strategic priority, we suggest a few amendments to the document language and planning.
 - a. *BCDC should explicitly acknowledge how past land use planning practices (e.g. redlining and de facto discrimination) contributed to the concentration of contaminated sites in lower-income communities of color and how the RSAP, Subregional Plans, and shoreline adaptation efforts must both acknowledge these inequities and ensure that both clean-up efforts and general adaptation plans prioritize the health, social cohesion, and livelihoods of frontline communities.*
 - b. *The RSAP should recommend that subregional coalitions work with the local community to prioritize clean-up sites across the subregion. With limited financial resources available for shoreline cleanup, prioritization of sites will be key. Climate Resilient Communities has already developed a tool that could be used as a template for community prioritization.*
 - c. *The creation of a convening authority to ensure collaboration of regulatory agencies in subregional plans will be critical to advancing this priority. Addressing shoreline contaminated sites will require collaboration with key regulatory agencies like the DTSC, the State/Regional Water Board, and the EPA. In the RSAP, it is currently unclear how BCDC will support subregional coalitions in coordinating with these agencies. BCDC must explore options for guiding regional collaboration with regulatory agencies to achieve this priority.*
 - d. *The map of contaminated sites on page 72 should be updated to include those located just outside of census tracts with a CalEnviroScreen score of 75 or greater, sites at risk of stormwater flooding and groundwater rise, high-risk [closed sites](#) that could still contribute to contaminant mobilization and health impacts (see SPUR's [Look Out Below](#) Report). In East Palo Alto, as an example, the majority of contaminated sites are located in the northeastern corner of the City in a census tract with a CalEnviroScreen score below 75. This cluster of sites, adjacent to a vulnerable community, shouldn't be overlooked by arbitrary census boundaries. Furthermore, the map shows only sites that are open/active, even though groundwater rise [may cause contaminant mobilization at closed sites](#) that have been remediated through strategies like capping. The use of the map should also be clarified: are the sites identified in the map the only ones that a subregion is required to assess? Please provide further guidance.*
 - e. *BCDC should require that Subregional Coalitions include both low-resourced and high-resourced jurisdictions in order to share/equitably distribute the resources that will be needed for planning, managing, and implementing costly shoreline adaptation projects.*

4. **Examples of local policy, program, and project best practices for shoreline adaptation:** We recommend that the RSAP or another tool produced by BCDC showcase sea level rise adaptation policy and development best practices that BCDC would like to see reflected in Subregional Adaptation Plans. Examples Include:
 - a. [Burlingame’s Sea Level Rise Overlay Zone](#) provides guidance for new development in advancing sea level rise resilience. Within the zone, new flood protection infrastructure must be built [six feet above the hundred-year flood elevation](#), with the first floor of new buildings at least three feet above that elevation. This zoning update was adopted in 2021.
Note: Overlay zones should also include design and retrofit requirements for underground infrastructure, and roadways (See SPUR’s [Look Out Below Report](#) & Oneshoreline’s [Planning Guidance](#)).
 - b. SFPUC [Floodwater Grant Program](#), with up to \$100,000 reimbursement for eligible properties for implementing flood-proofing projects. *Note: Grants that require upfront payments with reimbursement may exclude low-income homeowners.*
 - c. [City of San Mateo Stormwater Fee](#): The dedicated revenue from this property tax will be used to fund repairs and improvements of aging stormwater infrastructure, which includes underground pipes, levees, and pumps. The policy was adopted in January 2024. *Note: Stormwater fee funding should be made available for green infrastructure projects, and fees should be set at a level that is feasible for new housing construction and does not overburden low-income residents.*

5. **Examples of multijurisdictional and/or multi-agency governance structures that can be used as models or structures for subregional planning:** We recommend that the RSAP or another tool produced by BCDC showcase multijurisdictional governance models that BCDC envisions could be replicated or transitioned to support the development of Subregional Adaptation Plan coalitions. Examples include:
 - a. Hayward Shoreline Planning Agency ([HASPA](#)): A joint powers agency consisting of leaders from the City of Hayward, East Bay Regional Park District, and Hayward Area Recreation and Park District.
 - b. [Oakland Alameda Adaptation Committee](#): A coalition of shoreline communities co-creating a coordinated subregional adaptation plan organized around the [San Leandro Operational Landscape Unit](#) (OLU). OAAC developed a white paper in August 2024 outlining potential governance strategies, this information should be shared with the broader region.
 - c. [21 Elements](#): A multi-year collaboration of all 21 city and county governments in San Mateo County and partner organizations to develop, adopt and implement local housing policies.
 - d. San Mateo County Flood and Sea Level Rise Resiliency District, [Oneshoreline](#): An independent government agency working across the County’s shoreline to address sea level rise, flooding, and coastal erosion. Oneshoreline was launched with start-up funding from the County and 20 incorporated cities.

Recommendations for BCDC on Implementing the RSAP:

1. **Develop additional tools to support effective subregional planning:**
 - a. *Develop a shoreline adaptation funding and financing guide that explores not only existing, competitive, (and unreliable) state and federal funding opportunities but also local funding and financing mechanisms.* Guidance should explore how to advance local policies to expand funding without disrupting housing development or burdening low-income households. Local funding and financing mechanisms could include special district parcel taxes, property fees, bonds, regional tax sharing, a regional resilience trust fund (Recommendation 12, SPUR [Safety First Report](#)), etc. SPUR would like to offer support in developing this guide.



Furthermore, to address competition in state and federal grant applications, BCDC should develop a funding prioritization tool to direct funding to projects that advance regional priorities and address areas with the greatest vulnerability now.

- b. *Provide a decision-making guide for the proposed adaptation approaches that take into account potentially conflicting priorities such as shoreline protection and maximizing infill development to address housing affordability.* We appreciate the inclusion of “relocate approaches”, but without guidance, relocation/retreat could further inequities or be ignored due to implementation challenges, even when it may be the best option. The decision-making guide should include tools and offer peer-to-peer learning spaces to help jurisdictions navigate the diversity of property owners (and renters) along the Bayshore and negotiate among potentially conflicting needs. As one example, HOAs will be important stakeholders to engage with for subregional planning yet the RSAP does not mention these entities.
2. **Support low-resource jurisdictions through a phased planning process & project-based planners:** While the guidance document provides a robust framework for adaptation planning, it would be strengthened by offering clear strategies to ensure that smaller and under-resourced jurisdictions receive adequate support and are not left behind. Many wealthier jurisdictions have already adopted several of the Regional Shoreline Adaptation Plan (RSAP) priorities and continue to have greater financial and staff resources for adaptation. The stark inequities across our region are a shared challenge. We recommend that BCDC implement a phased planning process for subregions that have not yet advanced coordinated planning efforts. For phased planning, Year 1 could be establishing subregional collaboratives and governance. Year 2 could be focused on evaluating existing plans and planning efforts that could feed into the RSAP process, etc. BCDC could also support a regional grant application to fund project-based planners for low-resource jurisdictions or provide a trained planner for each subregion to coordinate and manage the Subregional planning process across jurisdictions.

Thank you for your time and attention to this matter. We look forward to seeing how the Bay Conservation and Development Commission will address the public's concerns and refine the plan and future efforts to ensure regional collaboration on shoreline adaptation planning. Thank you for taking on this regional leadership role.

Sincerely,

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