



City of Alameda California

September 23, 2021

Dear Bay Adapt Leadership Advisory Group,

The City of Alameda is pleased to provide comments on the draft Bay Adapt Joint Platform. We commend BCDC and the Leadership Advisory Group for your work to synthesize and bring together the many voices in sea level rise adaptation to create a shared vision and plan for the future of the Bay. We wholeheartedly endorse the Joint Platform principles and suggest inclusion of a principle for “working across jurisdictional boundaries”.

As a low-lying island in San Francisco Bay, the City of Alameda is deeply concerned about the impacts of sea level rise and committed to working closely with our neighbors and communities to develop innovative solutions to the challenges we face. Recognizing the governance challenges of adapting a highly developed shoreline, City of Alameda staff convened the San Leandro Bay/Oakland Alameda Estuary Adaptation Working Group in July 2021 with the goal of coordinating projects that protect and restore water quality, habitat, and adjacent community vitality along this waterfront. Following the Adaptation Atlas guidance, we aligned the planning boundaries with the San Leandro Operational Landscape Unit and included all the landowners, regional and state agencies and stakeholders with an interest in that shoreline. We recognize that the best way forward on adaptation is together and are now seeking funding through the California Resilience Challenge Grants to develop a shoreline action plan, formalize our organizational structure such as a JPA, and fund our community-based partners so they will have a seat at the table and can help drive this process. State and regional governments can play an important role in facilitating sub-regional planning efforts.

Support organizing at the OLU scale across jurisdictions

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

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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.

Elevate frontline communities

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.

Streamline project delivery process

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.

Adaptation 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.

General Comments

- Executive Summary
 - 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.”
- Joint Platform
 - 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 front-and-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 sub-regional level; the chart looks more top-down approach.
 - Page 7: please include the definition of environmental justice directly in the document.

Thank you for the opportunity to comment on the draft Bay Adapt Joint Platform. The City of Alameda looks forward to moving toward a more collaborative, holistic approach to sea level rise adaptation planning and supporting the vision of the Joint Platform.

Sincerely,



Danielle Mieler
Sustainability and Resilience Manager

