

Public Comment: Item 76**State Lands Commission Meeting, April 29, 2020**

These comments are being provided by Philip Gibbons (Program Manager, Energy & Sustainability) and Lily Tsukayama (Associate Planner, Planning) on behalf of the San Diego Unified Port District.

Good afternoon Chair Yee, Commissioners, Executive Officer Lucchesi, and staff,

Thank you for the opportunity to provide public comment, especially given our new working conditions and public meeting requirements via Zoom and teleconference. We appreciate that the State Lands Commission (Commission) has provided multiple options for how to submit our comments.

As a grantee of state lands, the San Diego Unified Port District (District) is appreciative of the state-wide coordination that the Commission has participated in and led on coastal resiliency efforts and sea level rise adaptation planning. In particular, we are encouraged by the Commission's continued acknowledgment that California ports will need flexibility to ensure that our critical infrastructure and Public Trust uses and assets will be protected and maintained considering future sea level rise projections. As we are learning from the COVID-19 pandemic, resiliency and adaptation in the face of future disruption is critical. Preparing for future stressors and hazards, including sea level rise, is important and an obligation of ours as an administrator of the Public Trust uses along San Diego Bay.

We are supportive of the values embedded in the "Making California's Coast Resilient to Sea Level Rise: Principles for Aligned State Action" and we are encouraged to see the level of state-wide alignment on this issue. As we recently completed and submitted our Assembly Bill 691 report assessing the vulnerabilities from projected sea level rise and severe storms, the District has identified key focus areas where we believe that the Commission and other agencies can help to provide more details, examples, and California case studies to advance coastal resiliency objectives. These include:

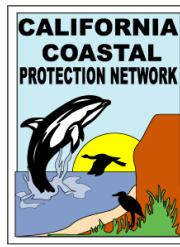
- **Navigating the regulatory environment:** Adapting existing regulatory processes to support permitting and entitlement of coastal resiliency projects (e.g., nature-based solutions such as living shorelines) is needed.
- **Financing and funding:** Identifying appropriate methods to assess economic risk and determine financial models to support resilient infrastructure will be useful for grantees of state lands, as well as identifying sustainable funding options to implement adaptation projects.
- **Protecting critical infrastructure and public access:** Ensuring that water-dependent infrastructure and coastal accessways remain resilient to projected

flooding and inundation will allow for the continued transport of freight and recreation in San Diego.

- **Innovating shoreline solutions and pilot projects:** Developing examples of innovative shoreline solutions and pilot projects in a bay and harbor environment is needed due to the space constraints along our urban waterfronts.
- **Promoting public access and equity:** Ensuring that our waterfronts are protected and available for all Californians is of the utmost importance.

As the “Making California’s Coast Resilient to Sea Level Rise: Principles for Aligned State Action” are adopted and implemented by the state agencies, and as future guidance and science is developed, we ask to continue to be a part of the conversation. Particularly in relation to the principles and further guidance from the State on protecting ports, critical infrastructure, and public access, we would like to collaborate with you and other state agencies to develop innovative and lasting shoreline and coastal resiliency solutions.

We appreciate the opportunity to provide these comments and we look forward to our continued partnership with the Commission to ensure coastal resiliency along San Diego Bay.



April 27th, 2020

State Lands Commission
100 Howe Avenue, Suite 100 South
Sacramento, CA 95825

Submitted via email at CSLC.CommissionMeetings@slc.ca.gov

RE: Adoption of Agenda Item #76: "Making California's Coast Resilient to Sea Level Rise: Principles for Aligned State Action"

Dear Members of the State Lands Commission,

The California Coastal Protection Network, the Surfrider Foundation and the Natural Resources Defense Council write to urge the State Lands Commission to adopt "Making California's Coast Resilient to Sea Level Rise: Principles for Aligned State Action," which is on the Commission's Agenda for Wednesday, April 29, 2020.

Since 2009, when the California Natural Resources Agency published the California Climate Adaptation Study, every reputable scientific assessment has confirmed that coastal impacts from climate change-induced sea level rise in California will occur more rapidly than previously projected with increasingly severe adverse impacts to coastal resources and critical coastal infrastructure. Numerous strategic plans and studies since have identified sea level rise as a pressing problem that California *must* tackle in order to preserve its environmental and economic security; until now, those plans and studies have been siloed under different agencies' jurisdictional authority, and collaboration and coordination between agencies has been sporadic even if well-intentioned.

Within that fractured environment, it has been relatively easy for certain sectors to co-opt rational messaging and undermine constructive efforts to tackle sea level rise. More often than not, lacking a clear state-mandated policy, individual agencies have found themselves on the defensive as they attempt to advance and implement scientifically based sea level rise policy. What has been missing as each agency has struggled to move sea level rise policy forward was a coherent set of principles *embraced by the state* that would bind the agencies together and set the direction for unified future efforts.

That changed in early 2020 when Natural Resources Secretary Crowfoot and CalEPA Secretary Blumenfeld convened two high level meetings of 17 state agencies to develop and approve Sea Level Rise Principles for use in planning, policy setting, project development and decision-making. By all accounts, the agencies coalesced in record speed on a set of six Principles that State Lands staff has concluded "will guide unified effective action toward sea level rise resilience around best available science, partnerships, alignment, communications, local support and coastal resilience projects."

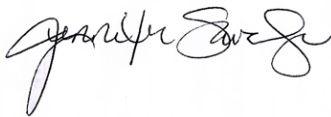
By being the *first* agency to vote to approve these Principles, the State Lands Commission will again demonstrate its strong leadership in carrying out its mission of providing the people of California with "effective stewardship of the lands, waterways, and resources entrusted to its care through preservation, restoration, enhancement, responsible economic development and the promotion of public access."

While the COVID-19 crisis poses extreme challenges to how government moves forward, we greatly appreciate that the staff and the Commission agenda'd this item and we urge you to adopt these Principles at your first remote meeting on April 29, 2020.

Sincerely,



Susan Jordan
California Coastal Protection Network



Jennifer Savage
Surfrider Foundation



Damon Nagami
Natural Resources Defense Council