## CALIFORNIA STATE LANDS COMMISSION



## **EXECUTIVE OFFICE**

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JENNIFER LUCCHESI, Executive Officer

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April 16, 2021

Mr. David Leach
Acting Principal Deputy Assistant Secretary of the Army (Civil Works)
Department of the Army
Office of the Assistant Secretary for Civil Works
108 Army Pentagon
Washington, DC 20310-0108

Major General William (Butch) Graham
Deputy Commanding General for Civil and Emergency Operations
US Army Corps of Engineers
441 G Street NW
Washington, DC 20314-1000

Re: Support 3x3x3 Waiver for the San Francisco Waterfront Flood Resiliency

Dear Mr. Leach and Major General Graham:

I write on behalf of the California State Lands Commission in support of the 3x3x3 waiver request by the US Army Corps of Engineers (USACE) San Francisco District and the Port of San Francisco for the San Francisco Waterfront Flood Resiliency Study.

The California State Lands Commission oversees sovereign land granted in trust by the California Legislature to roughly 70 local jurisdictions, including the Port of San Francisco, that generally consist of prime waterfront lands and coastal waters. Through its actions and oversight, the Commission secures and safeguards the public's access rights to natural navigable waterways and the coastline and preserves irreplaceable natural habitats for wildlife, vegetation, and biological communities.

On April 29, 2020, the State Lands Commission adopted "Making California's Coast Resilient to Sea Level Rise: Principles for Aligned State Action."

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## These principles include:

- 1) Develop and utilize best available science
- 2) Build coastal resilience partnerships
- 3) Improve coastal resilience communications
- 4) Support local leadership and address local conditions
- 5) Strengthen alignment around coastal resilience
- 6) Implement and learn from coastal resilience projects

The partnership between the USACE and the Port of San Francisco on the San Francisco Waterfront Flood Resiliency Study is an opportunity to fulfill these principles on one of the most beloved and publicly-oriented waterfronts in California.

San Francisco, including the Port of San Francisco, has the expertise and the political commitment to address climate change. The Port of San Francisco is subject to AB 691, adopted by the California Legislature in 2013, which requires public trust grantees like the Port to prepare and submit to the Commission assessments of how it proposes to address sea level rise. The San Francisco Waterfront Flood Resiliency Study is a vital effort that will inform not only how the Port of San Francisco can adapt to rising sea levels, but how other ports and public trust grantees in California adapt to this challenge. The California State Lands Commission appreciates your commitment to the San Francisco Waterfront Flood Resiliency Study.

Thank you for your consideration.

Sincerely,

JENNIFER LUCCHESI Executive Officer

cc: Speaker Nancy Pelosi
Senator Dianne Feinstein
Senator Alex Padilla
Mayor London Breed
San Francisco Port Commission President Kimberly Brandon
Port Executive Director Elaine Forbes

Mr. David Leach Major General William (Butch) Graham April 16, 2021 Page 2

Mr. Alvin (Al) B. Lee, Director of Civil Works

Mr. Eric Bush, Acting Chief, Planning and Policy Division

Brig. General Paul Owen, USACE South Pacific Division (SPD) Commander

Mr. Bradd Schwichtenberg, Deputy Chief, SPD Regional Integration Team

Ms. Cheree Peterson, SPD Programs Director

Dr. Josephine Axt, Chief, SPD Planning Division

Lt. Colonel John D. Cunningham, S.F. District Commander and District Engineer



April 26, 2021

Speaker Nancy Pelosi U.S. House of Representatives 1236 Longworth H.O.B. Washington, DC 20515

Re: Support \$3 Million Community Funding Request for the San Francisco Waterfront Flood Resiliency

Dear Speaker Pelosi:

I write this letter to express my enthusiastic support for a \$3 million Community Funding Request for the U.S. Army Corps of Engineers (USACE) San Francisco Waterfront Flood Resiliency Study (the Study).

The waterfront managed by the Port of San Francisco is a prime national and international destination, with attractions including the San Francisco Giants ballpark, Exploratorium Museum and Fisherman's Wharf, and a cherished destination for San Francisco residents. The Embarcadero Seawall protects San Francisco's dense financial district and access to regional public transit. We estimate there is approximately \$140 billion in public and private assets and economic activity in the Study area.

San Francisco voters overwhelmingly supported resilience for the waterfront by passing a \$425 million General Obligation Bond for this effort with a decisive 82 percent vote of approval.

San Francisco, with our partners, continues to be a national leader in planning for the impacts of global sea level rise, and this Study provides an important opportunity to further that leadership together with USACE. The knowledge and experience of the Port and USACE teams make this an ideal study for demonstrating a new and highly visible national standard for managing complex urban flood challenges.

I am confident we will succeed in building a resilient San Francisco waterfront for California and the nation.

Sincerely,

PORT OF SAN FRANCISCO

Elaine Forbes, Executive Director

Port of San Francisco

cc: Mayor London Breed

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## San Francisco Bay Conservation and Development Commission

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March 25, 2021

Mr. David Leach
Acting Principal Deputy Assistant Secretary of the Army (Civil Works)
Department of the Army
Office of the Assistant Secretary for Civil Works
108 Army Pentagon
Washington, DC 20310-0108

Major General William (Butch) Graham
Deputy Commanding General for Civil and Emergency Operations
U.S. Army Corps of Engineers
441 G Street NW
Washington, DC 20314-1000

Re: Support 3x3x3 Waiver for the San Francisco Waterfront Flood Resiliency

Dear Mr. Leach and Major General Graham:

I am writing to support the 3x3x3 waiver request by the U.S. Army Corps of Engineers ("USACE") San Francisco District and the Port of San Francisco for the San Francisco Waterfront Flood Resiliency Study.

The San Francisco Bay Conservation and Development Commission ("BCDC") administers the McAteer-Petris Act, the San Francisco Bay Plan, and the San Francisco Special Area Plan for the San Francisco Waterfront with respect to the Port of San Francisco. BCDC also administers the federal Coastal Zone Management Act with respect to the San Francisco Bay-related activities of federal agencies such as USACE.

During the past decade, BCDC has been convening San Francisco Bay Area governments and a wide variety of stakeholders to address risks to San Francisco Bay and local governments due to rising sea levels. Currently, BCDC is leading the Bay Adapt planning program, an initiative to establish collaborative regional agreements on the actions necessary to protect people and the natural and built environment from rising sea levels.

USACE has been and will continue to play a vital role in working with local agencies to mitigate flood risks around the Bay. The San Francisco Waterfront Flood Resiliency Study is one of the first USACE flood risk general investigations with a focus on a densely developed urban waterfront with critical City and regional infrastructure in the future flood zone. Successful completion of this study will guide other flood-prone cities in the region and nationally as they tackle the inevitable challenges of rising sea level.



San Francisco, including the Port of San Francisco, has the expertise and the political commitment to address climate change. The partnership between USACE – the nation's flood experts – and the Port of San Francisco should yield exciting and innovative solutions to vexing problems. This includes new approaches to urban stormwater management that will be required with the addition of coastal flood defenses and tidal flooding, as well as groundwater rise when high tides can result in sunny day flooding. BCDC staff has appreciated the invitation to participate in the Resource and Regulatory Agency Working Group supporting this effort.

Sea level rise science is constantly evolving, which injects a high level of uncertainty to these planning efforts. In its role administering the McAteer Petris Act and the federal Coastal Zone Management Act, BCDC applies the State of California's Sea Level Rise Guidance established by the Ocean Protection Council ("OPC"). OPC's sea level rise curves project 3.4' of sea level rise by 2100 in the low risk aversion scenario, up to 7' in a medium – high risk aversion scenario, and upward of 10' in the extreme risk aversion scenario.

We have much to learn together about climate adaptation in a complex and iconic urban setting like San Francisco. BCDC appreciates your commitment to completing the San Francisco Waterfront Flood Resiliency Study and other resilience planning efforts around San Francisco Bay.

Thank you for your consideration.

Sincerely,

LAWRENCE J. GOLDZBAND

**Executive Director** 

cc: Speaker Nancy Pelosi

Senator Diane Feinstein

Senator Alex Padilla

Mayor London Breed

San Francisco Port Commission President Kimberly Brandon

Port Executive Director Elaine Forbes

Mr. Alvin (Al) B. Lee, Director of Civil Works

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