SAN FRANCISCO
BAYKEEPER®

May 17, 2021

Andrew Thomas
Planning, Building + Transportation Dpt.
2263 Santa Clara Ave, Rm 190
Alameda, CA 94501

transmitted electronically to athomas@alamedaca.gov

RE: Comments of San Francisco Baykeeper on March 2021 Draft: Alameda General Plan Update

Dear Mr. Thomas:

Thank you for the opportunity to review Alameda's Draft General Plan Update. We sincerely appreciate the opportunity to engage in the lead-up to the release of the Draft General Plan and your willingness to adopt portions of our recommended sea level rise adaptation policies. Based on our review of General Plans in the region, Alameda will be one of the few to recognize sea level rise at all in its General Plan. Given Alameda's susceptibility to rising Bay waters, we applaud your proactive stance. We encourage minor amendments to the sea level rise adaptation policies to promote greater specificity in design elevations to account for sea level rise. We also include here additional recommended language related to landscaping-oriented water conservation.

San Francisco Baykeeper ("Baykeeper") is a non-profit public benefit corporation organized under the laws of the State of California with its office located at 1736 Franklin Street, Suite 800, Oakland, California, 94612. Baykeeper submits these comments on behalf of its approximately 5,000 members and supporters who live and/or recreate in and around the San Francisco Bay area. Baykeeper's mission is to defend San Francisco Bay from the biggest threats and hold polluters and government agencies accountable to create healthier communities and help wildlife thrive. Our team of scientists and lawyers investigate pollution via aerial and on-the-water patrols, strengthen regulations through policy advocacy, and enforce environmental laws on behalf of the public.

Adopt Policies that Encourage Water-Wise Landscaping and Water Conservation

As California experiences drought conditions more frequently, water conservation is increasingly important in all sectors of our State. Residential and municipal landscaping commonly represent over half of the total municipal water demand. Landscapes that incorporate native and drought-tolerant plants can lower municipal water demand substantially and make our communities more resilient. In addition, water-wise landscaping techniques include soil modifications that encourage water retention on-site and increase the planted landscape's ability to sequester carbon dioxide. Applied at scale, such modifications can reduce stormwater runoff and contribute to reductions in greenhouse gasses that drive climate change. Finally, native and drought-tolerant landscapes require less fertilizer and fewer pesticide treatments, leading to improved quality of any stormwater runoff that does not infiltrate locally.

Because California's future water supplies are increasingly uncertain and potentially unreliable and Alameda residents want to participate in sustainable solutions to the emerging water scarcity and climate crises, we encourage Alameda to exceed current landscape water efficiency standards. The Model Water Efficient Landscape Ordinance (MWELO) is already required under California Building Code, and Water Use Classification of Landscape Species (WUCOLS) is a crucial component to MWELO implementation.

We encourage Alameda to reinforce and expand current landscaping practices found in the City's existing Bay-Friendly Ordinance 3049 and the State's water efficiency mandates by adopting policies and actions that encompass these practices on all municipal, commercial, and residential landscapes both in new development and throughout ongoing maintenance.

Below, we recommend language to add to the relevant sections of the Alameda General Plan in the following sections: Land Use + City Design, Conservation + Climate Action, and Health + Safety. We also support recommendations made by ReScapeCA in their comments on this Draft General Plan.

Model General Plan Language for Bay-Friendly Landscaping:

We encourage Alameda to include the following policies in its Final General Plan:

- Limit the use of pesticides, herbicides, and fertilizers throughout the city by fostering healthy soil practices, which includes organic carbon amendments (e.g., compost and mulch) on all non-turf planting areas (CC-16 Section(b) Bay-friendly Landscapes; CC 34 Section(d) Water Quality)

- Utilize automatic, self-adjusting irrigation controllers (smart irrigation systems) on all irrigation systems with three or more valves or landscaped areas of 1,000 sq. ft. or more. (CC-16 Section(a) Water Efficiency and Conservation)

- Limit ornamental turf areas to no more than 25% of the total landscaped area on new or redeveloped landscape areas. (CC-16 Section(a) Water Efficiency and Conservation)

- Convert all of the green waste generated in residential or municipal facilities into organic carbon soil amendments (e.g., via grasscycling, mulching, or composting). Application of locally generated soil amendments will be required on all city-owned landhe City will encourage its use on privately-owned landscapes by offering it for free or minimal cost to private companies and Homeowners Associations. (CC-17 Zero Waste)

- Plantings on new and retrofitted landscapes must be grouped based on hydrozones (plants of similar water needs) to minimize water waste and runoff. (CC-16 Section(b) Bay-friendly Landscapes)

- Encourage soil health and carbon sequestration by promoting and educating the public about the benefits of organic carbon soil amendments that improve water retention and maximize atmospheric carbon sequestration in local landscapes. (CC-4 Section(f) Local Climate Impact Mitigations)

Adopt Specific Sea Level Rise Projections for Planning Purposes

Proposed Policies in Alameda's General Plan, including CC-19 through CC-24, represent a potentially transformative approach to applying local discretion for new and redevelopment projects in the region. Baykeeper recognizes that the various sea level rise-related guidance documents, maps, and risk assessments available make local decision-making challenging, and State and regional regulators have not provided concrete guidance on local land-use decisions. That said, we encourage Alameda to identify which sea level rise projections to adopt for development and planning purposes.

The current draft General Plan contains several Actions and Tasks that require inferences regarding which of the numerous sea level rise projections to adopt to identify buffer lands (CC-19.d); prioritize the adoption of nature-based flood controls (CC-19.f), and; discourage new and redevelopment of sensitive development in the future flood zone (CC-19.c). Actions also include the development of neighborhood flood protection plans (CC-21) and consideration of groundwater flooding (CC-23), requiring decisions regarding which specific guidance to adopt for planning and making land-use decisions.

Sea level rise research has matured over the last two decades, thus providing a greater degree of confidence in numeric sea level projections. We recommend incorporating the numeric guidance from the most up-to-date guidance from the Ocean Protection Council (OPC) for sea level rise in California to develop inundation maps

according to CC-19.a, to inform land-use planning (CC-19.c) and development approvals (CC-20).[1] See Table 1 of OPC's Guidance for projected sea level rise (in feet) for San Francisco.

According to the 66%, 5%, and 0.5% probabilities, we recommend preparing inundation zone maps that sea levels will rise to these levels by 2070 and 2100. OPC refers to these projections as the 'Low Risk Aversion' category of the 'Likely Range', the '1 in 20 Chance', and the '1 in 200 Chance'. Maps should represent sea level rise projections to the years 2070 and 2100, based on Table 1 of the 2018 OPC guidance, to inform flood risk over the reasonable lifetime of an average project. Table 1 below provides the corresponding 'High Emissions' projections for San Francisco, which appear appropriate given global trends.

Table 1. Sea level rise projections from the CA Ocean Protection Council

Time-based Scenario	Likely Range (low-risk aversion)	1 in 20 Chance (medium risk aversion)	1 in 200 Chance (medium-high risk aversion)
2070	1.9 ft	2.4 ft	3.5 ft
2100	3.4 ft	4.4 ft	6.9 ft

Project approvals should ensure that areas at little or no risk of flooding are developed in preference to sites at higher risk and that projects do not exacerbate flood risk to vulnerable communities. The aim should be to keep all development out of high (Likely Range) and medium (1 in 20 Chance) flood risk areas and other areas affected by other sources of flooding. Projects able to withstand periodic flooding and that do not exacerbate surrounding flood risks (e.g., recreation and parks) may be considered. All opportunities to locate new flood-incompatible developments (i.e., housing and commercial developments) in areas of little or no flood risk must be evaluated and prioritized.

We encourage the explicit adoption of this conservative numeric guidance to drive the well-considered Actions and Tasks from the Draft General Plan to foster a more resilient Alameda. We understand the inclusion of numeric criteria in planning documents presents challenges for local decision-makers. Yet, the absence of concrete guidance creates confusion, delay, and disagreements. The OPC guidance intends to increase transparency for the local communities that choose to adopt their recommendations. Given Alameda's susceptibility to future flood risk, we encourage you to maximize transparency in decision-making processes.

***

Thank you again for your willingness to accept public comments and interest in adopting climate-ready measures to protect the City of Alameda and its residents. Please feel free to contact me with any questions or concerns at ian@baykeeper.org or (510) 735-9700 x 108.

Sincerely,

Ian Wren
Staff Scientist, San Francisco Baykeeper

Aundi Mevoli
Program Intern, San Francisco Baykeeper

[1] State of California Sea Level Rise Guidance. 2018 Update. Available at https://opc.ca.gov/webmaster/ftp/pdf/agenda_items/20180314/Item3_Exhibit-A_OPC_SLR_Guidance-rd3.pdf