



SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

August 10, 2021

Vice Mayor Pat Burt and Councilmember Alison Cormack
S/CAP Ad Hoc Committee

City of Palo Alto

Via email: Pat.Burt@cityofpaloalto.org
Alison.Cormack@cityofpaloalto.org

RE: S/CAP Ad Hoc Committee Topics and Timeline

Dear Vice Mayor Burt and Councilmember Cormack,

Thank you for the opportunity to comment on the agenda and timeline for the Ad Hoc Committee's work in advance of your August 12 kick-off meeting. We would like to see the Ad Hoc Committee:

1. Expedite the City's Sea Level Rise Vulnerability Assessment and Adaptation Plan and add them to the Ad Hoc Committee's agenda to inform the S/CAP Update
2. Ensure that nature-based solutions are pursued throughout the S/CAP framework.

As noted in our [April 13, 2020 S/CAP letter to the City Council](#), we strongly support and encourage ambitious efforts toward emission reductions. We hope that Palo Alto maintains its reduction target of 80% by 2030 and would like to see the City shift toward local reductions rather than bridging strategies such as offsets.

We are concerned, however, that the Ad Hoc Committee's agenda does not include focused attention to the Sea Level Rise Adaptation and Natural Environment goals in the draft S/CAP Update. Although emissions reductions are critical to slowing the global effects of climate change, we urge you not to lose sight of the equally critical and current need for strategies to mitigate inevitable local impacts of sea level rise (SLR) as well as current threats to the urban forest and the biodiversity of our natural environment due to temperature, drought, and development.

Sea level rise threats are accelerating. Adaptation planning as well as protecting and enhancing natural infrastructure should be integral parts of sustainability and climate action discussions at the Council level.

News coverage is mounting about [SLR threats](#) and [biodiversity loss](#) due to climate change impacts as well as the importance of [nature-based solutions](#) and [green and "sponge" infrastructure for flood resilience](#).

In April 2020, the Ocean Protection Council (OPC) published new guidance, *Principles for Aligned State Action* indicating increasing threats from sea level rise and urging statewide policy makers to

use a minimum baseline projection of 3.5 feet of SLR by the year 2050 for planning, decision-making, project design and implementation of sea level rise resilience strategies. Just last month, the Mountain View City Council unanimously voted to update its SLR planning approach from a “Low-Plus” to a High Sea Level Rise Scenario.

The City’s Sea Level Rise Vulnerability Assessment is a key piece of the sustainability and climate action puzzle. It should be expedited, added to the agenda for the Ad Hoc Committee, and reflected throughout the S/CAP Update.

The City’s March 18, 2019, Sea Level Rise Adaptation Policy directs that planning for sea level rise should be a consistent and integrated part of the S/CAP.

We want to emphasize that adaptation planning should address not only vulnerabilities, but also opportunities for nature-based adaptation. The [Adaptation Atlas](#) created by the San Francisco Estuary Institute identifies a variety of suitable strategies for Palo Alto that take advantage of natural processes.

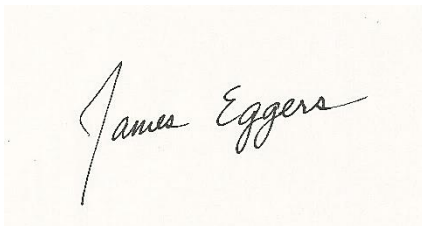
Unfortunately, the City’s sea level rise adaptation planning appears to have fallen significantly behind schedule. The SLR Vulnerability Assessment, originally scheduled for completion in Q1, 2021, seems to have stalled. As a result, a series of public meetings to develop a responsive SLR Adaptation Plan (intended to run from January to September 2021) have not yet occurred. Those delays bring into serious doubt whether the Adaptation Plan will be completed by the revised target of December 2021.

We wish to point out that the Ad Hoc Committee’s timeline for finalizing the S/CAP Update in January/February 2022 could therefore preclude integration of key actions and policies emerging out of the SLR Vulnerability Assessment and Adaptation Plan.

We hope to see the Ad Hoc Committee advance a fully informed S/CAP Update that puts the City on a timely and effective city-wide path not only to reduce emissions, but also to adapt to sea level rise, mitigate climate impacts on our natural ecosystems, and expand the climate benefits of our urban forest. Those nature-based considerations must be part of any robust planning for sustainability and climate action.

Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink on a light-colored background. The signature reads "James Eggers" in a cursive script.

James Eggers
Executive Director
Loma Prieta Chapter Sierra Club

Cc: Gladwyn d'Souza
Chair, Conservation Committee
Loma Prieta Chapter Sierra Club

Susan DesJardin
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