



VIA EMAIL

June 23, 2017

California Natural Resources Agency
Climate@Resources.ca.gov
1416 Ninth St., Suite 1311
Sacramento, California 95814

Subject: Safeguarding California Plan: 2017 Update – California’s Climate Adaptation Strategy

Dear Sir or Madam:

Thank you for the opportunity to provide comment and input on the Safeguarding California Plan (Plan): 2017 Update – California’s Climate Adaptation Strategy proposed by the California Natural Resources Agency (CNRA).

The mission of the San Diego Unified Port District (District) is to protect the Tidelands Trust resources of San Diego Bay by providing economic vitality and community benefit through a balanced approach to maritime industry, tourism, water and land recreation, environmental stewardship, and public safety. The District was created with the San Diego Unified Port District Act (hereafter “Port Act”) and adopted by the California State Legislature in 1962. The Port Act recognizes the Public Trust Doctrine, and states that tidelands and submerged lands are only to be used for statewide purposes. To this end, the District is charged with management of tidelands and diverse waterfront uses along San Diego Bay that promotes commerce, navigation, fisheries, and recreation on granted lands.

The District became one of first ports in the nation to establish greenhouse gas reductions goals and adopted a Climate Action Plan (CAP) in 2013. To achieve the goals, the CAP contains a menu of strategies focused on mitigating emissions relative to a 2006 baseline 10% by 2020 and 25% by 2035. Recognizing that the impacts of climate change may affect the Public Trust uses of San Diego Bay, adaptation is also a critical focus for the District.

We acknowledge the hard work that the CNRA has performed to update the Plan and appreciate CNRA’s recent workshop held in San Diego on June 12, 2017, to solicit local stakeholder input. In regards to the 2017 Update to the Plan, the District respectfully offers the following comments regarding proposed policies and strategies.

June 23, 2017

California Natural Resources Agency

RE: **Safeguarding California Plan: 2017 Update – California’s Climate
Adaptation Strategy**

1. Balance Environment, Community and Economy

Chapter 8 of the Coastal Act provides policies specific to ports in California, including the District. In enacting Chapter 8, the Legislature recognized the unique role ports play to the economy and found that ports “constitute one of the state’s primary economic and coastal resources” and that they “are an essential element of the national maritime industry” (Coastal Act Section 30701.) The District is an economic engine for the region contributing \$8.3 billion to the regional economy and supporting 63,000 jobs.

The District has invested over \$1.7 billion since 1963, including, but not limited to, two maritime cargo terminals, the cruise ship terminals, the San Diego Convention Center and expansion, the airport and terminals, south bay wildlife refuge, and 22 parks. The District provides substantial regional economic benefits through generation of tax revenues for our member cities, including \$100 million annually in discretionary revenue sources derived from property, sales, and transient occupancy taxes. The District also contributes approximately \$30 million annually in marine terminal related state and local tax revenue. These revenues do not fund the District’s operations.

The 2017 Update to the Plan focuses primarily on Social Systems, the Built Environment, and Natural and Managed Resource Systems (page 4) and does not recognize the distinctive nature of ports and the District – physically, statutorily, and economically. The District appreciates the efforts to provide strategies for protection of natural resources and disadvantaged communities, but believes there is an imbalance as to the application of strategies to protect important economic drivers, such as ports. The District requests that the 2017 Update to the Plan include additional strategies focused on protecting ports that contribute substantial economic benefits to the region and the state and that provide a more balanced approach to the overall strategic framework.

2. Protect Water-Dependent Uses and Associated Transportation Infrastructure

California ports are critical gateways of trade throughout the United States and support a significant number of jobs in the state. The State’s ports rely on transportation systems including both land-based (roads, rail, etc.) and water-based (e.g., ocean-going vessels, harbor craft, etc.) networks and associated infrastructure to facilitate the movement of goods and services. The District’s properties are, and will be, primarily composed of water-dependent and water-related uses consistent with Section 30235 and Chapter 8 of the Coastal Act. The District identifies water-dependent uses as development, facilities, or activities that depend on access to, or frontage on, navigable waters to be able to function. Further, the District identifies water-related uses as those that do not require a waterside site but must be located in close proximity to the water. Both uses rely upon these land-based and water-based transportation systems to thrive and grow.

June 23, 2017

California Natural Resources Agency

RE: **Safeguarding California Plan: 2017 Update – California’s Climate
Adaptation Strategy**

Due to the location of ports along California’s coasts and harbors, they are susceptible to rising sea levels and severe storms. While the Plan identifies policies and strategies to “Improve transportation system resiliency” (Recommendation T-4), we are concerned the 2017 Update does not adequately distinguish and prioritize water-dependent and water-related uses that are important economic engines for California. These uses may require specific structural strategies to become resilient to climate change impacts. We highly encourage the CNRA to include additional policies and strategies in the Plan that differentiate and prioritize water-dependent and water-related uses from non-water dependent/related uses and the transportation infrastructure, specifically water-based systems, upon which they rely.

3. Enhance Protection of Public Trust Assets and Uses

As a grantee of the tidal and submerged lands in and around San Diego Bay, the District has a mission to protect and promote the Public Trust Doctrine uses including commerce, navigation, fisheries, recreation, and natural resources. The Public Trust uses are for the benefit of all Californians and the Plan should prioritize the protection of all of these assets and uses.

Recommendation O-1.5 addresses the need to develop policies to protect the Public Trust along the coast; however, the Plan is vague as to the definition of those uses. The District recommends that the Public Trust uses be further identified in the Plan. The Recommendations in O-1.5 address the need to safeguard beaches, public access, and cultural and archeological resources threatened by climate change, but do not acknowledge the breadth of Public Trust uses such as navigation, commerce, and fisheries, which will also need to be protected.

4. Support Education and Guidance on Financing Solutions for Climate Change

The District supports the many policies and strategies in the Plan to provide education and guidance to local jurisdictions and agencies regarding climate change adaptation. The cost of developing resilience to climate change is significant. Of importance to agencies faced with infrastructure planning and investment, further guidance regarding financial models and solutions to fund infrastructure is necessary. The District encourages California agencies to provide financial guidance, which may include but not be limited to grant funding opportunities, public-private partnerships, tax incentives, and other financial mechanisms to support both structural and nature-based infrastructure solutions.



June 23, 2017

California Natural Resources Agency

RE: **Safeguarding California Plan: 2017 Update – California’s Climate Adaptation Strategy**

The District appreciates the opportunity to comment on the Safeguarding California Plan: 2017 Update – California’s Climate Adaptation Strategy and looks forward to future collaboration with the California Natural Resources Agency and other agency partners to address our concerns.

If you have any questions regarding these comments, please contact me at (619) 686-6473 or via email at jgiffen@portofsandiego.org.

Sincerely,

A handwritten signature in blue ink that reads "Jason H. Giffen".

Jason H. Giffen
Assistant Vice President
Planning and Green Port

cc: Randa Coniglio, CEO/President