



April 15, 2024

Colonel Timothy Hudson, Commander
U.S. Army Corps of Engineers – Tulsa District
2488 E 81st Street
Tulsa, Oklahoma 74137-4290

Dear Colonel Hudson:

I am writing to provide the City of San Francisco's (City), the non-federal sponsor, formal comments on the San Francisco Waterfront Coastal Flood Study ("Flood Study" or "Study") Draft Integrated Feasibility Report and Environmental Impact Statement ("Draft Report"). The City team is excited about the Total Net Benefits Plan ("Draft Plan") developed by the Project Delivery Team ("PDT"). As lead agency for the City, the Port of San Francisco ("Port") is eager to continue our partnership to revise the Draft Plan in response to public and agency comments on the path to a Chief's Report and recommendation to Congress.

The Draft Plan analyzes where the USACE and City should build coastal flood defenses and implement an adaptation strategy to address sea level rise through non-structural measures or coastal flood defenses with foundations designed to withstand foreseeable earthquakes. Based on the work of the PDT to date, the USACE and City team is positioned to better plan and develop the specific waterfront improvements that will both reduce risks and meet our vision for a safe, equitable, inclusive waterfront for all.

We applaud the USACE team for the work to date. This Draft Plan represents a first for USACE for an urban mega-study, including adaptive management over time. Instead of a plan developed with a narrow focus on costs and avoided flood damages, the USACE and Port team assessed a comprehensive list of metrics that includes regional economic benefits, environmental quality and social effects and selected a Draft Plan based on these comprehensive benefits.

These metrics – coupled with public feedback to date – have shaped how the Draft Plan prioritizes life safety and emergency response, enhances and sustains economic and ecological opportunities, and ensures public access to the waterfront and historic places for all.

The City did not request a Locally Preferred Plan as part of the Final Array. As long as the Draft Plan remains similar to the description in the Draft Report, we only see the need to retain the option for betterments that may be identified during the Preconstruction Engineering and Design Phase ("Design Phase") of the project, subject to any supplementary environmental impact analysis and compliance which may be required.

Subject to further consultation with you and the Assistant Secretary of the Army (ASA), the City team is considering a request to the ASA to further examine combined flood risk under Section

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8106 of the Water Resources Development Act ("Section 8106") during the Study or the Design Phase.

If requested by the City and approved by the ASA, Section 8106 would expand the scope and authority of the feasibility study to consider climate change related impacts to the existing stormwater system, such as increased rainfall intensity, and an elevated ground water table caused by relative sea level change. Efforts to date have demonstrated that neighborhoods outside the Study area are hydraulically connected through the combined sewer system, including areas immediately north and south of the Port. Additionally, the effects of groundwater rise on mobilizing contamination is a significant local concern, and constituents are asking that the Study examine this issue and recommend a path forward.

We want to thank you and Brigadier General Kenneth Reed for the manner in which your team has engaged with the City team, City department heads and community stakeholders. Their patient answers helped us and our City partners understand how the USACE process will continue refinement of the plan through examination of public, resource agency and City department comments. Exhibit A to this letter documents City recommendations regarding how the Draft Plan can evolve through the next phases of the Study, the subsequent design process or concurrent local actions outside the USACE project.

Thank you again for your partnership as we worked through Draft Report publication and public engagement. We believe the work has established a foundation of collaboration that will be instrumental in ensuring the successful implementation of this project for the benefit of the people of San Francisco and the entire nation. We look forward to advancing this vital effort to build a waterfront that can meet the challenges of the coming decades.

Sincerely,

DocuSigned by:

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Michael Martin, Acting Executive Director
Port of San Francisco

Exhibit A: Tentatively Selected Plan Refinements Proposed by the City of San Francisco –
Study Period and Preconstruction, Engineering and Design Phase

Exhibit B: Preliminary Port Review of Agency and Public Comments

cc: Mayor London Breed
Board of Supervisors President Aaron Peskin
Mr. Eric Bush, USACE Chief of Planning and Policy
Mr. Wes Coleman, Director of Programs for the USACE Southwestern Division
City Administrator Carmen Chu
Jeff Tumlin, Director of Transportation, S.F. Municipal Transportation Agency
Rich Hillis, Planning Director
Dennis Herrera, General Manager, S.F. Public Utilities Commission
Carla Short, Director of Public Works

Exhibit A: Tentatively Selected Plan Refinements Proposed by the City of San Francisco – Study Period and Preconstruction, Engineering and Design Phase

Through discussions since public release of the Draft Plan, the City team has identified the following key issues we wish to address as the Study progresses to a Chief's Report, and subsequently in the Preconstruction, Engineering and Design Phase ("Design Phase") – if USACE recommends a plan to Congress and Congress authorizes a project.

As described in the Draft Report, the Draft Plan manages coastal flood risk through a suite of Coastal Flood Risk Management (CFRM) measures including nonstructural features, elevated CFRM measures with ground improvements and inland drainage features that function as a system, based on rising sea levels, and are implemented over time based on the risk of sea level rise.

Exhibit B includes a preliminary Port review of agency and public comments which have informed or correspond to comments made by the City in this letter. The Port looks forward to conducting a comprehensive analysis of and responses to agency and public comments with the PDT as part of preparation of the Final Report.

The PDT has already started evaluating some of the subreach alterations the PDT identified in the Plan Formulation Appendix and suggestions the City team previously made which were captured under Views of the Non-Federal Sponsor. The City appreciates the work the PDT is conducting to incorporate Engineering with Nature in areas that will not conflict with maritime functions, including the potential for new habitat features south of Pier 14 along Rincon Park.

To assist the Project Delivery Team, we have sorted our recommendations into proposed changes that should be evaluated based on costs, benefits and impacts in the remaining study period ("Study Period") and during the Design Phase.

We have jointly received numerous public and public agency comments on the Draft Plan which will shape our path forward. The City team has not yet received or reviewed all of these comments. Where we have reviewed agency or public comments on the Draft Plan that relate to the comments below, we have noted the source of those comments.

I. Study Period

Combined Flood Risk

During the Study period, our teams should further analyze inland drainage impacts of the Draft Plan to properly scope and estimate the required infrastructure to manage impeded stormwater.

A key driver for this request is the fact that Bayside of San Francisco is hydraulically connected through its combined sewer system, including areas immediately north and south of the Port, and our teams should further analyze the Draft Plan and its inland drainage impacts and costs resulting from this connectivity. Further study will allow us to determine whether significant replumbing of properties, sewer separation in the public realm, and waterproofing the gravity

sewer system in the impacted areas may be required. This, in turn could inform improved costing and design.

As described above, the City is interested in learning more about Section 8106 and how this new 2022 WRDA authority could enhance the Flood Study. If requested by the City and approved by the ASA, Section 8106 would expand the scope and authority of the feasibility study to consider climate change related impacts to the existing stormwater system such as increased rainfall intensity and an elevated ground water table caused by relative sea level change.

The PDT should identify multiple courses of action in response to a Section 8106 approval which could include 1) increasing the scope of the inland drainage assessment during the Study Period or 2) deferring detailed inland drainage analysis to the Design Phase but utilizing appropriate cost contingencies and describing the Design Phase scope of work in the Final Report.

The scope required to meet Section 8106 request could also include assessing the effects of groundwater rise on mobilizing contamination. This is a significant local concern and constituents are asking that the Study examine this issue and recommend a path forward. By incorporating the authority and associated benefits provided by Section 8106, the Draft Plan would provide multiple comprehensive flood risk reduction benefits, including the ability to defend local and regional transit systems including BART, Muni and Caltrain.

Extend Reach 2 Treatment from Pier 27 to Pier 35

During the initial identification of the Total Net Benefits Plan, the PDT was constrained to evaluating the alternatives at the reach level because the team had cost, impact and benefit analysis at the reach level.

We recommend taking a structural approach for Subreach 1-3 (Pier 29.5 to Pier 35), similar to the approach proposed for Reach 2 (Alternative G), for the following reasons:

- Piers 29-35 are a collection of piers that are part of the most intact segment of the Embarcadero Historic District. This segment extends from Pier 15 to Pier 35. Abruptly ending the approach of rebuilding wharves at a higher elevation at Pier 27 will impact the District which can be reduced by extending this treatment to Pier 35. Several commenters endorsed this specific change to the Draft Plan, including Telegraph Hill Dwellers, San Francisco Heritage and the San Francisco Historic Preservation Commission.
- This action will also increase benefits relating to life safety and maritime use that were used to justify the Draft Plan approach to Reach 2.

- Extending elevated coastal flood defenses north will also defend critical City infrastructure such as the North Point Wet Weather Plant at Bay Street which discharges to the Bay at Pier 35.
- The Draft Plan, as currently envisioned, will result in partial or full reconstruction of the Embarcadero through Pier 27. From a transportation system perspective, the more natural end point for future improvements along this transportation corridor is Bay Street (close to Pier 35), after which the Embarcadero turns into more of a local street to access Fisherman's Wharf.

The PDT will need to evaluate whether the reduced impacts and increased benefits of this recommendation justify the increased costs.

Yosemite Slough

During the public comment period, the PDT has repeatedly heard concerns about the southern boundary of the Study ending at the southern boundary of the Port – with clear ramifications for the Bayview community. At least three public commenters expressed concern about the geographic scope of the Flood Study, including Linda Dallin, Greenaction for Health and Environmental Justice (“Greenaction”), and the San Francisco Historic Preservation Commission.

The San Francisco General Plan's recently adopted Environmental Justice Framework¹ highlights the City's “long history of policy and land use decisions that have disproportionately exposed communities to environmental pollutants [...] residents in Bayview Hunter's Point grapple with the impacts of industrial contamination at the Hunter's Point Shipyard, air pollution from the U.S. Highway 101 and Interstate 280 freeways, and other environmental violations. The impacts of the climate crisis, which include poor and hazardous air quality, extreme weather events, and sea level rise, are predicted to exacerbate these health disparities.”

Early in the Flood Study, the PDT decided to focus the Study on the Port of San Francisco's jurisdiction. The PDT determined at the time that areas of San Francisco fronting San Francisco Bay both south and north of the Study area would not demonstrate sufficient flood damages to meet then-existing policy requirements to meet a Federal interest. The Assistant Secretary of the Army's Comprehensive Documentation of Benefits in Decision Documents memorandum, dated 5 January 2021, has since changed USACE policy.

SF Planning is advancing the Yosemite Slough Neighborhood Adaptation Plan under a \$649,000 grant from the Governor's Office of Planning and Research with technical advisory support from the Port. Planning and Port staff have met with USACE representatives on several occasions to explore methods of engaging with USACE now to make sure that this work is consistent with USACE guidelines and can qualify for Federal funding through USACE later to support design and construction.

¹ Draft San Francisco Environmental Justice Communities Map. San Francisco General Plan. 2023. <https://sfplanning.org/project/environmental-justice-framework-and-general-plan-policies#ej-communities>.

City staff recommends the following next steps:

- Planning and Port staff to meet with USACE staff to develop a shared recommendation for the path forward for Yosemite Slough eligibility for USACE funding, including courses of action for consideration by decision-makers.
- PDT representatives meet with the Assistant Secretary of the Army (or representatives) prior to the June USACE Agency Decision Milestone to discuss options.

Authorization Language

The City team believes that it is critical to develop a shared approach to language authorizing the San Francisco Waterfront Coastal Flood Study during the Study period, in consultation with the Assistant Secretary of the Army. Authorizing language should incentivize the City to pursue other Federal funding for resilience actions consistent with the Recommended Plan and to implement any of the 1st actions in the Recommended Plan with available non-Federal resources, including:

- An accounting system to credit the City for early investments in design and construction for elements of 1st actions in the Recommended Plan towards its local matching requirements, subject to USACE oversight and guidance under Sections 221 of the Flood Control Act of 1970 as further amended (collectively, “Section 221”) or Section 204 of the WRDA of 2014 as further amended (collectively, “Section 204”); and
- A system to incentivize local pursuit of other Federal resources to implement the Recommended Plan with funding sources, including specific authority to substitute other Federal sources for portions of the Recommended Plan.

Remaining Study Authority

Relevant Study authorities under Section 110 of Rivers and Harbors Act of 1950, Section 142 of WRDA 1976, as amended by Section 705 of WRDA 1986 and Section 8325(b) of WRDA 2022, and Section 203 of WRDA 2020, as amended by Section 8325(a) of WRDA 2022 should remain intact for areas to the north and the south of the Study area, including:

- The Hunter’s Point Shipyard, Yosemite Slough and Candlestick Point;
- The Marina District and adjoining lands including Crissy Field in the Presidio and Fort Mason; and
- The areas of the City fronting the Pacific Ocean, including Ocean Beach.

The City requests further consultation with USACE as to the role that USACE can play in study of flood risks to property owned by other Federal agencies, such as the National Park Service.

Actions may be required in the future on such property, including construction of coastal flood defenses, to defend adjacent local publicly or privately-owned land. The City team believes that USACE expertise would be a benefit to both the City and the National Park Service.

II. Design Phase

The City requests that the following issues be examined in the Design Phase of the project, either on a cost-shared basis (justified by costs, benefits or impacts) or as potential betterments.

Equity

We have heard clearly from the public a desire to prioritize equity as this project advances. Given the historic underinvestment in San Francisco's Bayview community by all levels of government, there is an understandable lack of trust expressed by some community members. We must build trust through demonstrable action. The following are some of the key equity concerns we have heard from the public:

- Concern about the timing of adaptation investments in the Bayview, which can be considered in the development of a Phasing plan. See discussion below under Phasing and Construction Sequencing Plan.
- Concerns about negative impacts to public health and the environment from contamination. See discussion below under Environmental Remediation.
- Concern that the Flood Study focuses on Port property and does not extend further south to the San Francisco County line. See discussion above under Yosemite Slough.
- Concern about impacts to the critical transportation network which is especially important for transit dependent riders in communities such as the Bayview. See discussion below under Transportation.

We also heard the following equity concerns which are addressed below:

- A desire for the local community to benefit from jobs and contracting opportunities.
- Concern that large-scale investment in the Bayview community and collective changes to the waterfront could lead to gentrification.
- Concern that the shoreline elevations in Reaches 3 & 4 are lower than the proposed elevation in Reach 2, and what that means for long-term resilience for the Bayview.

Jobs and Contracting

City staff understands that Federal contracting and local contracting with the use of Federal funds cannot include local preferences but must instead focused outreach to disadvantaged business enterprises. We would appreciate the opportunity to talk further with USACE staff with expertise in contracting and job training to better understand how we can align our local efforts to prepare businesses for future contracting opportunities and to prepare workers for job opportunities with approved Federal processes.

Gentrification and Displacement

Given the lack of trust among Bayview community residents, real thought should be given as to how to further engage constituents during the Design Phase. When designing infrastructure and changes to the public realm, we should adopt the posture of designing these improvements with the local community, rather than designing them for the community. This approach will yield more ownership over the Recommended Plan and confidence that what is ultimately constructed will support the community rather than contributing to displacement. This can take the form of targeted engagements to identify local priorities that can lay the groundwork for community benefit planning agreements.

Shoreline Elevations in Reaches 3 & 4

In Views of the Non-Federal Sponsor in the Draft Integrated Feasibility Report, the City expressed a desire to examine higher shoreline elevations south of the Bay bridge consistent with the approach proposed for Reach 2. Subsequent feedback from the PDT suggested that this would amount to a significant change to the Draft Plan which is not supported by the comprehensive benefits analysis that the PDT conducted to select the Draft Plan. City staff understands that response.

Several members of the public endorsed higher shoreline elevations in Reaches 3 and 4, including SPUR, Greenbelt Alliance, and Save the Bay.

In the Design Phase, we recommend examining this issue in further detail when we have more detailed engineering and cost estimates that will help us examine the incremental costs of increased elevations in targeted areas such as Mission Creek and Islais Creek.

There may be other ways to address community concerns about differential elevations between Reach 2 and Reaches 3 and 4, including understanding where and when risks will occur, identifying any pinch points that may be more difficult or disruptive to construct in multiple phases (similar to the Embarcadero), and providing written language in the authorization that provides assurance that subsequent moves to elevate and adapt the shoreline will occur, subject to the Monitoring and Adaptation Plan.

Engineering

Study guidance² required the PDT to:

- “Develop multi-hazard formulation strategies that reflect timing, location, and severity differences in risk.”

Through this process, the PDT developed a Total Net Benefits Plan with robust foundations that will enable coastal flood defenses to survive an earthquake with repairable damage. Further work is required in the Design Phase of the project to characterize soil conditions and identify and compare cost-effective measures to support coastal flood defenses.

Historic Preservation

The PDT received comprehensive comments related to the identification and treatment of historic resources that should guide design, the application of the Secretary of the interior Standards for Treatment of Historic Properties and the National Park Service Guidelines on Flood Adaptation for Rehabilitating Historic Buildings, and the remainder of the Section 106 consultation process. This will be particularly important where the Recommended Plan includes plans to replace wharves at a higher elevation, elevate structures such as the Ferry Building, replace or strengthen existing contributing resources such as this historic seawall, and introduce new features such as floodwalls around existing piers.

Commenters include the Telegraph Hill Dwellers, Barbary Coast Neighborhood Association, Hudson Pacific Properties, San Francisco Heritage, San Francisco Historic Preservation Commission, U.S. Environmental Protection Agency Region 9 and U.S. Department of the Interior.

Maritime Access and Tenant Impacts

The PDT has received numerous expressions of concern about maritime access and Port tenant impacts, including questions from Hudson Pacific Properties and CBRE (representing the owners of Pier 1 ½, 3 & 5) about how waterfront destinations such as the Ferry Building will be impacted by the Draft Plan and whether continuous public access to piers can be maintained during construction.

The Water Emergency Transportation Authority, the San Francisco Bar Pilots and the Maritime Commerce Advisory Committee all commented on the vital role of Port berths to the maritime industry and the need to maintain continuous operations to support water transportation.

Port staff recommends robust engagement and a participatory design process so that tenants who have invested time and resources in the waterfront can understand the proposed approaches to shoreline construction, with particular attention to methods for raising or floodproofing existing buildings.

² Memorandum, SACW, dated December 2021, Subject: Study Guidance for Completion of the San Francisco Waterfront Coastal Flood Study, CA

Urban Design

City departments wish to play a significant role in waterfront design, potentially through Sections 221 and 204. The City is particularly interested in leading the process to design how future coastal flood defenses integrate into the City. Understanding early “big moves” and urban design scenarios (e.g., roadway configuration, connecting to Downtown and economic generators, alignment and approach to bulkhead buildings and piers, parks and open space, etc.) will be fundamental to the next phase of refinement and preliminary engineering.

It is crucial to the City (and core to the Port’s public trust mission) that we maintain and enhance a generous and welcoming public waterfront. This includes the need to have a generous amount of space for the public promenade and continued visual access to the waterfront, with no steep walls, stairs, or terraces that would block the view of the water from the city. In some areas, this may require adding space outside of the exact footprint of the Total Net Benefits Plan.

Space along the Embarcadero is constrained in some areas – particularly between Broadway and Bay Street and between the Agriculture Building and Rincon Point. There may be a need to consider additional Bay fill or other interventions to minimize Embarcadero Roadway and light rail impacts and to avoid the SFPUC transport storage boxes in these zones, while providing a generous promenade, public access, and visual connection to the waterfront.

Waterfront design in major coastal cities has clear ramifications for the nation’s economy. We understand that urban design considerations could not be addressed in significant detail at this stage. City staff are interested in a future policy discussion with USACE about how urban design decisions play a role in the Assistant Secretary of the Army’s Comprehensive Documentation of Benefits in Decision Documents memorandum, dated 5 January 2021. We look forward to continued collaboration with USACE in addressing the major urban design decisions and refining preliminary engineering and design for the waterfront, consistent with the principles described in EM 1110-2-38, Environmental Quality in Design of Civil Works Projects.

Environmental Remediation

The City acknowledges that sites with hazardous materials in the project area that are covered by existing USACE Hazardous, Toxic and Radioactive Waste (“HTRW”) guidance³ would be avoided or require remedial action by the City or parties responsible for the existing contamination at no cost to USACE, which may reduce the levels of contamination or minimize impacts to human health and the environment.

The Port has documented recent and past efforts to address contaminated sites in the Study area, including potential vulnerability to ground water rise expected from sea level rise. Port staff believe that upland areas of the Port have been fully characterized and will work with the

³ USACE HTRW Guidance:

https://www.publications.usace.army.mil/Portals/76/Publications/EngineerRegulations/ER_1165-2-132.pdf

USACE team to organize this information in a manner that satisfies the PDT. The San Francisco Bay Regional Water Quality Control Board (“RWQCB”) has issued an order for the San Francisco Public Utilities Commission (“SFPUC”) to characterize Mission Creek and Islais Creek. We propose to work with SFPUC staff and the PDT to ensure that this sampling effort satisfies USACE requirements.

Assuming that these two efforts satisfy USACE, the remaining areas that would require additional Phase 2 investigation would be the near-shore areas in the Study area outside of the creeks. Port staff recommend waiting to sample those areas until the Design Phase, when we jointly have a better understanding of the exact footprint of proposed in-water work.

Numerous commenters including Greenaction, SPUR, Save the Bay, Greenbelt Alliance, the San Francisco Bay Shoreline Contamination Cleanup Coalition, the Bay Conservation and Development Commission, and the U.S. Environmental Protection Agency expressed concern about groundwater rise in the near-shore areas mobilizing contamination, resulting in risks to human health and the environment.

As part of discussions regarding a potential Section 8106 request to the Assistant Secretary of the Army, the City requests a plan in the Study Phase to engage with the U.S. Environmental Protection Agency, the California Department of Toxic Substances Control, the RWQCB and the Department of Public Health to scope a risk assessment and alternatives analysis in the Design Phase to develop required remedial actions focused on:

1. specific sites with contaminants of concern (volatile organic compounds, water soluble contaminants, etc.) including remedial actions that a responsible party should take to protect human health and the environment;
2. specific design of shoreline improvements to mitigate the influence of sea level rise on the nearshore groundwater table and/or which can mitigate mobilization of contaminants; and
3. management of groundwater that reaches the surface as sea level rise continues.

Transportation

The City team (including the San Francisco Municipal Transportation Agency and San Francisco County Transportation Authority) has emphasized the importance of avoiding impacts to the transportation network including impacts that would affect transit access to the Muni Metro East rail facility and to the Southeast community and impacts to street safety, particularly for the most vulnerable street users, pedestrians, and bicyclists. This includes design of coastal flood defenses in the area from the Embarcadero Muni Portal to the 4th Street Bridge (“Peter R. Maloney Bridge”) that avoids construction in the area occupied by existing light rail vehicle (“LRV”) tracks and supporting transportation infrastructure to the extent practicable.

The City requests that the PDT evaluate adapting the following three bridges in lieu of gate closure structures during the Design Phase: 3rd Street Bridge (“Lefty O’Doul Bridge”), 4th Street

Bridge (“Peter R. Maloney Bridge”) and Illinois Street Bridge. The 4th Street Bridge carries approximately 60% of the City’s LRVs to the Muni Metro East LRV Maintenance Facility every day; this is also a critical access point for light rail service to the Bayview community. Gate closure structures have the potential to disrupt transit service to disadvantaged populations that rely on transit as their primary means of transportation.

The PDT will need to evaluate whether the reduced impacts and increased benefits of this recommendation justify the increased costs. If USACE later determines that elevating or replacing bridges would be a betterment, the City team requests USACE assistance contacting other Federal agencies to help identify funds and make the case that these investments are a critical component of a resilient transportation system.

Full comments from the SFMTA are included in a resolution adopted by the San Francisco Municipal Transportation Agency Board of Directors⁴.

Phasing and Construction Sequencing Plan

We have received questions from both policymakers and the public about implementation of the Draft Plan. We propose defining this topic in two broad categories:

Phasing ⁵	How Draft Plan first actions will be phased geographically across the waterfront, by reach or subreach, based on risk, funding and related factors discussed further below; and
Construction Sequencing	How Draft Plan phases will be implemented in each reach or subreach to limit disruption to the public, neighborhoods and Port tenants, maximize efficiency, keep the waterfront open for business and maintain public access to the Bay.

The factors that should inform Phasing of the Draft Plan include:

- Overtopping and outflanking flood risk;
- Multi-hazard risk;
- Equitable investment;
- Time required to conduct remedial actions in advance of construction, if required;
- Time to design and implement phases;

⁴ For a copy of the SFMTA Board resolution, please see: https://www.sfmta.com/sites/default/files/reports-and-documents/2024/04/4-2-24_mtab_item_10.5_waterfront_coastal_flood_study_feedback_and_resolution_resolution.docx_.pdf

⁵ For clarity, we propose that the term phasing be used to describe the orderly implementation of 1st actions described in the Draft Plan, and that the term Adaptive Management or Adaptation Pathways be used to describe the implementation of 2nd action triggered by the proposed Monitoring and Adaptation Plan.

- Timing of major local investments more efficiently made in conjunction with the Recommended Plan (e.g., public-private partnerships to invest in piers, major transportation construction projects, utility system projects);
- Efficient use of resources;
- Transportation and utility system functionality;
- Federal and local financial capacity; and
- Availability of other major funding sources to implement the Recommended Plan.

The PDT received several letters, including correspondence from the Telegraph Hill Dwellers and the Barbary Coast Neighborhood Association, expressing concern about construction-period impacts to surrounding residents and businesses, including concerns about noise, air quality, the effects of construction on nearby homes, and changes to traffic patterns, including emergency vehicle access.

Port staff recommends robust public and Port tenant engagement during the development of phasing and construction sequencing so that residents can understand what to expect, including duration of construction periods, and mitigation that will be available to mitigate impacts.

Exhibit B: Preliminary Port Review of Agency and Public Comments

This exhibit includes a preliminary Port of San Francisco review of agency and public comments which have informed or correspond to comments made by the City in this City Comment Letter. Comment letters here are sorted by type of comment; some letters appear multiple times because they address multiple issues.

This is not a comprehensive analysis of or response to agency and public comments, which will be conducted by USACE in consultation with the City as part of preparation of the Final Report.

Air Quality and Carbon Footprint

Connor Woodrich, Fortrera, March 29, 2024
Alana Guzzetta & Juan Gonzalez, Vulcan Materials Company, Tarek Khan, Master Builders Solution Admixtures US LLC, March 29, 2024
Francisco Dóñez, U.S. Environmental Protection Agency Region 9, March 29, 2024

Alternative Design

Don Coughlan, January 29, 2024
Charles Johnson, February 19, 2024
Heather Hodgins, March 1, 2024
Jake Sigg, March 25, 2024

Bay Fill

Erik Buehmann, San Francisco Bay Conservation and Development Commission, March 29, 2024
Xavier Fernandez, San Francisco Bay Regional Water Quality Control Board, March 27, 2024
Sarah Atkinson, SPUR, Zoe Siegel, Greenbelt Alliance, David Lewis, Save the Bay, March 26, 2024

Construction Impacts on Neighborhoods

Stan Hayes & Nancy Shanahan, Telegraph Hill Dwellers, March 24, 2024
Diana Taylor, Barbary Coast Neighborhood Association, March 28, 2024

Engineering with Nature

Noreen Weeden, March 22, 2024
Eddie Bartley, California Native Plant Society, San Francisco Chapter, March 27, 2024
Glenn Phillips, Golden Gate Bird Alliance, March 29, 2024
Xavier Fernandez, San Francisco Bay Regional Water Quality Control Board, March 27, 2024
Francisco Dóñez, U.S. Environmental Protection Agency Region 9, March 29, 2024
Erik Buehmann, San Francisco Bay Conservation and Development Commission, March 29, 2024

Equity

Greenaction for Health and Environmental Justice, March 29, 2024
San Francisco Bay Shoreline Contamination Cleanup Coalition, March 29, 2024
Erik Buehmann, San Francisco Bay Conservation and Development Commission, March 29, 2024
Seth Hamalian, Fisherman's Wharf Revitalized, LLC, March 30, 2024

Groundwater Rise

Erik Buehmann, San Francisco Bay Conservation and Development Commission, March 29, 2024
Francisco Dóñez, U.S. Environmental Protection Agency Region 9, March 29, 2024
Sarah Atkinson, SPUR, Zoe Siegel, Greenbelt Alliance, David Lewis, Save the Bay, March 26, 2024
Greenaction for Health and Environmental Justice, March 29, 2024

Hazardous Materials Contamination

Erik Buehmann, San Francisco Bay Conservation and Development Commission, March 29, 2024
Francisco Dóñez, U.S. Environmental Protection Agency Region 9, March 29, 2024
Sarah Atkinson, SPUR, Zoe Siegel, Greenbelt Alliance, David Lewis, Save the Bay, March 26, 2024
Greenaction for Health and Environmental Justice, March 29, 2024
San Francisco Bay Shoreline Contamination Cleanup Coalition, March 29, 2024

Historic Preservation

Stan Hayes & Nancy Shanahan, Telegraph Hill Dwellers, March 24, 2024
Diana Taylor, Barbary Coast Neighborhood Association, March 28, 2024
Chris Pearson, Hudson Pacific Properties, March 29, 2024
Francisco Dóñez, U.S. Environmental Protection Agency Region 9, March 29, 2024
Woody LaBounty, San Francisco Heritage, March 27, 2024
Diane Matsuda, San Francisco Historic Preservation Commission, March 29, 2024
Janet Whitlock, U.S. Department of the Interior, March 22, 2024

Maritime Access

Seamus Murphy, Water Emergency Transportation Authority, March 29, 2024
Ellen Jonck, Marina Secchitano, Maritime Commerce Advisory, March 28, 2024
Erik Buehmann, San Francisco Bay Conservation and Development Commission, March 29, 2024

NEPA Compliance and Subsequent Environmental Review

Greenaction for Health and Environmental Justice, March 29, 2024
San Francisco Bay Shoreline Contamination Cleanup Coalition, March 29, 2024
Stan Hayes & Nancy Shanahan, Telegraph Hill Dwellers, March 24, 2024

Francisco Dóñez, U.S. Environmental Protection Agency Region 9, March 29, 2024

Open Space and Public Access

Lee Huo, San Francisco Bay Trail Project, March 8, 2024

Glenn Phillips, Golden Gate Bird Alliance, March 29, 2024

Noreen Weeden, March 22, 2024

Kate Blumberg, March 12, 2024

Erik Buehmann, San Francisco Bay Conservation and Development Commission, March 29, 2024

Port Tenant Impacts/Considerations

Chris Pearson, Hudson Pacific Properties, March 29, 2024

Chaudel Baker, CBRE, Piers 1 ½, 3 & 5

Seamus Murphy, Water Emergency Transportation Authority, March 29, 2024

Ellen Jonck, Marina Secchitano, Maritime Commerce Advisory, March 28, 2024

Capt. John Carlier, San Francisco Bar Pilots, March 12, 2024

Sarah Bertram, Mission Creek Harbor Association, March 29, 2024

Seth Hamalian, Fisherman's Wharf Revitalized, LLC, March 30, 2024

Study Boundaries

Linda Dallin, March 25, 2024

Greenaction for Health and Environmental Justice, March 29, 2024

San Francisco Historic Preservation Commission, March 29, 2024

Transportation

Tom Radulovich, Livable City, March 29, 2024

Stan Hayes & Nancy Shanahan, Telegraph Hill Dwellers, March 24, 2024

Diana Taylor, Barbary Coast Neighborhood Association, March 28, 2024

Kate Blumberg, March 12, 2024

Lee Huo, San Francisco Bay Trail Project, March 8, 2024

Seamus Murphy, Water Emergency Transportation Authority, March 29, 2024

Francisco Dóñez, U.S. Environmental Protection Agency Region 9, March 29, 2024

Erik Buehmann, San Francisco Bay Conservation and Development Commission, March 29, 2024

Water Recreation

Diane Walton, Dolphin Swimming and Boating Club, March 1, 2024

Josh Sale, South End Rowing Club, March 27, 2024

Lex Perillat, Mariposa Hunters Point Yacht Club, March 6, 2024

Mission Creek Harbor Steering Committee & Sea Level Rise Working Group, March 29, 2024

Erik Buehmann, San Francisco Bay Conservation and Development Commission, March 29, 2024