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W6e

ADDENDUM

November 16, 2021

TO: California Coastal Commissioners and Interested Public

FROM: John Ainsworth, Executive Director
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SUBJECT: **Addendum to Item W6e, Recommended Final Draft of "Critical Infrastructure at Risk: Sea Level Rise Planning Guidance for California's Coastal Zone"**

I. NEW CORRESPONDENCE

Staff has received several additional comments related to the lack of discussion on desalination plants in the Critical Infrastructure Guidance (see the updated correspondence for this item). In particular, comments requested that the Commission explicitly recognize that desalination facilities are "critical infrastructure" that is subject to the rigorous sea level rise and adaptation planning principles laid out in the draft Guidance documents.

As described in the staff report for this item, staff chose to focus the Guidance on transportation and water infrastructure generally – and highways, rail, local roads, wastewater treatment, stormwater, and certain types of water supply facilities in particular – based both on informational needs as determined by a stakeholder survey at the beginning of this project, and as a reflection of the types of projects that have already come before the Commission. For example, the Commission has required adaptation planning for several wastewater treatment plant projects that have come before the Commission, and staff has spent significant time coordinating with Caltrans staff on sea level rise planning topics including specific adaptation projects for vulnerable highway segments. The discussion in this Critical Infrastructure Guidance reflects and expands on this experience.

To date, there has not been a similar level of coordination on sea level rise adaptation planning for desalination facilities, as this is an emerging technology with projects in the initial planning process and only a few projects constructed in California. However, the Commission recognizes the need for additional sea level rise planning information for desalination facilities, as well as other types of development, and will continue to coordinate with stakeholders and provide guidance on these topics. As with all projects, sea level rise analysis and adaptation considerations are and will continue to be an integral part of the decision-making process for proposed desalination facilities, and the Commission will review individual projects on a case-by-case basis.

Importantly, while the Guidance does not explicitly address desalination facilities, the decision to not include this type of infrastructure in the Guidance in no way reflects an indication that desalination facilities are not "critical infrastructure" or that the recommendations in the Guidance will not apply to them. On the contrary, the adaptation considerations discussed in the Guidance may be broadly applicable to a variety of development, including desalination facilities, that share certain characteristics, such as that they provide important public services; constitute large, complex, expensive, and/or cross-jurisdictional facilities; or would cause significant disruption to public welfare if damaged.

Whether or not particular desalination facilities meet these or other characteristics, and therefore that the rigorous, long-term sea level rise planning principles outlined in the Guidance are applicable to them, would need to be determined on a case-by-case basis. Some additional edits (as outlined below) are proposed to be added to the recommended final draft Guidance to clarify and further emphasize that the Guidance does not include an exhaustive list of possible critical infrastructure types; that planning and decision-making, including determinations of what may or may not be "critical" will continue to be made on a case-by-case basis; and that the adaptation considerations discussed in the Guidance may be broadly applicable to a variety of development types that share certain characteristics.

II. PROPOSED CHANGES TO RECOMMENDED FINAL DRAFT CRITICAL INFRASTRUTCURE GUIDANCE

The following edits are proposed to the recommended Final Draft Critical Infrastructure Guidance. Language to be added is shown in underline. Language to be removed is shown in ~~strikethrough~~.

- Page 17: "This Guidance address two main types of critical infrastructure: transportation and water. ~~For the purposes of this document, *critical infrastructure* includes c~~Coastal roads, highways, and railroad facilities are discussed in ~~(see~~ Chapter 5~~)~~, and ~~*critical water infrastructure* includes~~ wastewater treatment, stormwater, and water supply facilities ~~(see~~ are discussed in Chapter 6~~)~~."

- The following footnote is proposed to be added in two locations (in the Executive Summary and Chapter 1, as shown below):

  This Guidance does not present an exhaustive list of all critical asset types that exist (or may be planned in the future) in the Coastal Zone. Determinations about what planning, siting, and design considerations should be applied to any development will be made on a case-by-case basis depending on the facts of the circumstances. The planning considerations discussed in the Guidance are broadly applicable to a variety of development types, and particularly for those that that share the characteristics discussed in the Guidance, including large or complex systems that provide public services or which could have significant consequences if damaged (see, *e.g.*, Chapter 3). For example, although desalination facilities are not explicitly discussed in the Guidance, these assets could be considered critical facilities if, for example, they are integrated with other water systems, provide needed or emergency water supply to communities, or have the potential to cause significant environmental impacts or social consequences if damaged by future hazards.

  1. The above footnote will be added to end of the following paragraph, along with the following proposed edit, in the Executive Summary (pg. vi):

     "The goal of this Guidance is to promote resilient coastal infrastructure and protection of coastal resources by providing local governments, asset managers, and other stakeholders with policy and planning information to help inform sea level rise adaptation decisions that are consistent with the California Coastal Act. The Guidance addresses specific assets that fall within two main types of critical infrastructure: transportation and water. While other ~~infrastructure types~~ assets, including power plants, gas pipelines, and desalination facilities, are not explicitly addressed, many described adaptation approaches could broadly apply to these types of infrastructure as well, because they share common characteristics with the infrastructure discussed in this Guidance, such as provision of public services, and a large, complex, and often cross-jurisdictional scale."

  2. The above footnote will also be added to the end of the following paragraph in the Introduction (Chapter 1, pg. 18-19):

     "This Guidance focuses on adaptation of transportation infrastructure (Chapter 5) and water infrastructure (Chapter 6), including highways, roads, railroads, wastewater, stormwater, and water supply infrastructure. Often, electrical, gas, and communication infrastructure is collocated with transportation infrastructure, and so those types of infrastructure may be indirectly addressed by the Guidance. Similarly, the California Coastal Trail and other recreational assets are frequently collocated with transportation infrastructure, and planning for those assets is often integrally related to planning for transportation infrastructure. Water and transportation sectors were selected as the focus of this Guidance to limit the scope to projects that are most frequently addressed in Coastal Commission and local government permitting and planning, and those that have planning features in common with other sectors. Other critical

infrastructure facilities, such as ports, harbors, airports, power plants, desalination facilities, and hospitals are outside this scope, and thus not specifically addressed in this document, though many described adaptation approaches could broadly apply to these types of infrastructure as well, because they share common characteristics with the infrastructure discussed in this Guidance, such as provision of public services, a large, complex, and often cross-jurisdictional scale, and others, as described in Chapter 3."

- Page 19: "However, because this Guidance is focused on certain types of transportation and water infrastructure, it will discuss these systems as resources that can be used to help protect critical water and transportation infrastructure from sea level rise…"