



June 23, 2017

California Natural Resources Agency
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 Sacramento, CA 95814
 Via Email: climate@resources.ca.gov

Re: Draft 2017 Safeguarding California Plan

The below signed organizations welcome the opportunity to provide comments on the draft 2017 Safeguarding California Plan: (“SCP” or “the Plan”).

We thank the Natural Resources Agency for producing this important document that outlines a strategy for state agencies and departments to address the impacts of climate change, both now and into the future. The Plan is an essential step in implementing EO B-30-15 and AB 1482, and provides a comprehensive summary of climate change impacts across California and a useful catalogue of available state resources and current state actions. The document should also help inform actions by local and regional entities to enhance climate resilience in their jurisdictions and will support many other state activities underway, including the Integrated Climate Adaptation and Resilience Program and the Climate Safe Infrastructure Working Group.

We appreciate the hard work that has resulted in this draft and the meaningful efforts to engage the public and seek their input. We respectfully request that you strengthen the final Plan by including a framework to prioritize implementation of adaptation strategies; fostering greater cross-sectoral integration; identifying resource and policy needs and including additional actions to increase public awareness.

The below comments focus on the overall plan. Some of the undersigned groups plan on submitting more detailed, sector-specific comments as well.

1. Include a framework to prioritize implementation of adaptation strategies. Each sector presents numerous ongoing actions and next steps, but consistently, lacks criteria to guide agencies in prioritizing their implementation. The final Plan should direct agencies to set priorities based on the criteria set out in EO B 30-15 and AB 1482, including:

- **Actions that protect the state's most vulnerable populations.** As the Safeguarding California Plan appropriately notes, climate change results in a disproportionate impact on vulnerable populations and disadvantaged communities and strategies that protect and benefit these communities should be prioritized. Recommendation CA-2 directs agencies to partner with vulnerable populations to increase equity and resilience through investments, planning, research, and education, and this goal should be specifically addressed and prioritized in all sectors.

The Plan should provide a clear process to ensuring that low-income people and disadvantaged and vulnerable communities benefit from the full advantage of adaptation strategies (such as energy retrofits, green buildings and green infrastructure, urban forestry, etc.) that, while they may have up-front costs, provide health, economic, and cultural co-benefits both over the near and longer-term.

- **Natural infrastructure solutions.** Recommendation CA-5 directs the prioritization of natural infrastructure solutions, but the Ocean and Coastal sector is the only chapter that mentions natural infrastructure in its recommendations. Each sector should include natural infrastructure solutions and identify how these will be prioritized in implementation.

As defined in statute, natural infrastructure is the preservation and/or restoration of ecological systems, or utilization of engineered systems that use ecological processes, to increase resiliency to climate change and/or manage other environmental problems. This may include, but is not limited to, floodplain and wetland restoration or preservation,

combining levees with restored ecological systems to reduce flood risk, and urban trees to mitigate high heat days.¹

- **Actions that both build climate preparedness and reduce greenhouse gas emissions.** While it is essential to prepare for the impacts of climate change, we must also continue to aggressively reduce greenhouse gas emissions and enhance carbon sequestration to slow the pace that climate risks become more severe or more common over time. California is a leader in efforts to address carbon pollution and the final SCP should clearly prioritize actions that provide the dual benefit of enhanced climate resilience and greenhouse gas mitigation in each section. This is also consistent with Recommendation CA-5.

As noted above, several of these criteria are mentioned in the Comprehensive State Adaptation Strategies (e.g., Recommendation CA-2 and CA-5), but it is not clear in the draft Plan how they are intended to specifically influence implementation activities in each sector. The final Plan should include these prioritization criteria for each sector's activities along with guidelines for what that means.

2. Foster greater cross-sectoral integration and encourage actions that benefit multiple sectors. The final SCP would benefit from a clear and comprehensive cross-sectoral strategy designed to facilitate collaboration among the various agencies and minimize potentially maladaptive decisions. Cross-sectoral integration was important in previous versions of the Plan, and is referenced inconsistently throughout the document. It also should be outlined in the beginning of the document and highlighted throughout the relevant sectors. This is especially important given the nature of climate change, which can result in significant overlap in impacts and solutions across sectors.

An overarching challenge for adaptation planning is the interdisciplinary nature of the issues, especially regarding natural and working lands. For example, forested watersheds are a critical source of California's water supply, represent important habitats necessary to maintain biodiversity and play an important role in carbon sequestration. Urban greening programs can provide tree canopy as well as public health benefits and reduce energy demand. While these benefits are referenced in the Water, Land Use, Public Health, and Forest chapters, the SCP lacks a clear coordinated plan that would help all these departments achieve greater results. Regrettably, the current organization of the Safeguarding California Plan fragments the discussion into distinct chapters, each written by individual departments. This structure does not encourage inter-departmental collaboration. Improving coordination between sectors, and departments, should be a priority going forward.

¹ Cal. Gov't Code §65302(g)(4)(c)(5)

Similarly, hotter and drier conditions may result in increased water demand being met from groundwater supplies, which requires electricity to pump. It may also result in less available hydropower, with the expectation that power plants will fill the energy gap at a time when higher temperatures could reduce their efficiency. The Plan briefly mentions this nexus in the Energy chapter, by highlighting the need for more research in this area, and in the Water chapter, by mentioning the Water-Energy grant programs. A more coordinated discussion of how the sectors and respective departments are, and plan to enhance working together and the anticipated benefits of closer collaboration would be helpful.

California's energy and transportation sectors are also interdependent in key ways. For instance, as the vehicle fleet becomes increasingly electrified, the resilience to higher demand of our electricity system during extreme weather will become even more important to ensuring a reliable energy supply to these vehicles.

This enhanced treatment of cross-sector coordination is consistent with Recommendation O-6 in the Ocean and Coastal chapter, but an overarching recommendation should be added to highlight cross-sectoral coordination and actions that benefit multiple sectors, such as urban greening, the water-energy nexus, forests and vehicle electrification, among others; and specific actions should be included in the final version of the plan.

Furthermore, the final Plan should also prioritize strategies that result in multiple benefits, in line with Recommendation CA-5. This emphasis could be strengthened throughout the SCP. For example, the SCP should employ landscape or watershed scale analyses and include a special focus on natural system function and services in addition to risk reduction, including water and food security, habitat for fish and wildlife, recreation, jobs, public health, and quality of life amenities.

3. Identify funding needs. For each ongoing action and next step, the final SCP should describe whether there is one or more existing funding stream (if funding is needed) and how long that funding will last. It should also highlight which ongoing actions and next steps are currently in need of funding and any potential funding sources.

4. Identify policy needs. The Plan should explicitly identify if enabling legislation or additional authority is needed to successfully carry out the ongoing actions or next steps identified in the SCP. The need for clarity around policy needs is critical; it will promote meaningful results and send a message to relevant stakeholders, including the legislature and private investors, on the need to adopt policy to support climate adaptation in California.

5. Report back on actions from 2009 and 2014. Past iterations of the Safeguarding California Plan outlined a number of short-term and long-term actions. The final SCP should review these

actions against the timelines and list the results in an appendix along with each action's current status (e.g., completed or ongoing).

6. Next steps and ongoing actions throughout the document should be more specific, include timelines, and identify agencies in charge of reporting back on progress. To ensure progress is being made, specific actors and deadlines for the next steps should be listed in each sector. In addition, next steps should be identified for all Comprehensive State Strategies. (If the sector-specific strategies are intended to serve as the implementation mechanism for the Comprehensive State Strategies, the Plan should make that explicit.) For each of these actions, progress reports should be made available to the public online on a regular schedule.

In closing, we are eager to collaborate with you and your staff to integrate our recommendations into the final Safeguarding California Plan and collectively, produce a final Plan that meaningfully reduces climate risk to the people and natural resources of California. We commend you for the good work that has been accomplished to produce this draft and thank you for the opportunity to provide these comments. Please do not hesitate to contact any of our groups for follow-up.

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