



June 23, 2017

California Natural Resources Agency  
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*Submitted via e-mail*

**RE: Comments on the Draft 2017 Update of the Safeguarding California Plan**

Dear Staff:

We thank you for the opportunity to comment on the Safeguarding California Plan's 2017 Draft Update ("Draft Update" or "Draft"). The undersigned organizations work directly with residents of disadvantaged communities throughout the San Joaquin Valley and Eastern Coachella Valley to advocate for sound climate policy across various sectors. These communities, predominantly low-income communities of color, are on the frontlines of climate change and do not have access to the resources and infrastructure necessary to adapt to the changes to come. Furthermore, disadvantaged communities in this region currently experience the poorest air quality in the country, severely high levels of water contamination, and staggering rates of chronic illness. We commend California's commitment to address these resource deficiencies and propose the following comments to strengthen the Draft.

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It is critical that all state strategies and plans to improve resiliency are implemented efficiently and equitably so communities that have been historically disinvested in can experience real, tangible benefits. The majority of California state agencies currently administer various programs, policies, and documents relating to climate change (for example, Air Resources Board's Scoping Plan Update), so it is important that these state-level programs are thoroughly integrated into one another. Furthermore, we emphasize the importance of collaboration between local, regional, and state agencies as we often find that local policies and planning do not reflect the state's climate goals.

**Agriculture and Public Health**

The San Joaquin Valley is the most agriculturally rich region in the state of California and produces crops for both national and international markets. Climate change, however, poses a threat to the health and

safety of farmworkers. Any state strategy to build community resilience must include robust strategies aimed at protecting farmworker health, as farmworkers are most vulnerable to extreme heat. We suggest that the Draft focus on engaging rural communities and farmworker populations through direct outreach that includes language translation, childcare, and food in order to gather meaningful input on cooling center siting and identify other farmworker health concerns. The State should also partner with farmworkers to ensure that federal farm labor regulations are enforced.

Farmworkers are not only vulnerable to the health risks of high heat, but are also exposed to harmful toxic chemicals from the overuse of pesticides. During a Safeguarding California workshop in Fresno in May 2017, residents from throughout the San Joaquin Valley expressed a concern about pesticides being sprayed so close to homes and schools, and without consideration of the farmworkers directly in contact with the chemicals. They noted the high rates of cancer and mental health issues in their communities and attributed this to the chemicals in their food and on the field. We suggest that the Draft consider a shift to an agroecological method of producing food to reduce the need for pesticides and urge the state to support small scale and environmentally sustainable farmers.

Despite being some of the largest export regions of fruits and vegetables in the nation, the Eastern Coachella Valley and the San Joaquin Valleys are home to a large number of the country's food deserts, or regions that lack access to fresh fruits, vegetables, and other healthful whole foods. Many neighborhoods do not have grocery stores, but rather a surplus of liquor and dollar stores, neither of which stock fresh produce. This poses a threat to public health, as seen by both regions' high rates of obesity and heart disease. Climate change will impact the productivity of the land, which will likely decrease the supply of fresh fruits and vegetables and therefore further drive low income communities of color into poverty and disease. Adaptation planning must consider food deserts and direct resources to support local organic farms, community gardens, and opportunities to build community-level food sovereignty. Examples of such resources are state-led research into diversified crop production, low-input and organic production techniques, and climate resilient soil management practices on-farm, as well as direct subsidies to small-scale farms who produce fresh fruits and vegetables to local markets, such as the CDFA Specialty Crop Block Grant.

The concentration of industrialized dairy farms in the Valley contributes to high levels of methane, ammonia and other air and water contaminants, and we are concerned with the Draft's reliance on dairy digesters as a main adaptation strategy for this sector. Dairy digesters have negative localized air impacts, further degrading the poor air quality in the San Joaquin Valley. State strategies aimed at reducing methane emissions from dairies must focus on altering the industrialized nature of dairy operations in the Valley and shifting to sustainable methods of dairy farming, rather than subsidizing the maintenance of this system. While Appendix A recommends an incentive program for non-digester manure management practices, the dairy digester program is still the main strategy included in this plan.

The state faces many ongoing challenges related to agricultural waste management and organics recycling. The Draft puts forward a number of stratified solutions to manage these challenges, including the use of digesters. While these solutions may provide a short-term reduction in overall GHG, they do not support local environmental outcomes or promote long-term soil restoration in our most depleted soils. We support holistic and comprehensive solutions to these waste management challenges that

minimize local air quality and water quality impacts, support markets for sustainable agriculture, and replace fossil-fuel inputs. Compost production is an elegant answer to many of the contamination problems related to waste disposal. Compost production results in a soil amendment product which can be used to replace fossil fuel fertilizers and agricultural pesticides and fumigants while also restoring water-holding capacity and other positive attributes to the San Joaquin Valley's dry and depleted soils. We would like to see compost production and use be named as an ongoing solution to waste management in perennial orchards and on dairies, and soil health be privileged as a tool to displace harmful and dangerous chemicals on farms.

### **Energy**

The California Energy Commission's Low-Income Barriers Study identifies many of the barriers that currently exist for renters and low-income households in disadvantaged communities to access energy efficiency and weatherization programs. It is critical that adaptation strategies actively work to remove these barriers, first by making information more accessible to residents and sensitive of community needs and by including more robust outreach and targeted demonstrations in disadvantaged communities. Furthermore, the draft should include a mechanism that ensures that all energy projects administered by the Energy and Public Utilities Commission do not result in adverse localized impacts to low-income communities.

Additionally, the state must direct investment to low-income, disadvantaged communities for electric vehicle infrastructure as both a climate change adaptation and mitigation strategy. Expanding charging stations to smaller, rural communities is an opportunity to encourage more widespread purchasing of zero-emission vehicles.

We also suggest stronger communication between the California Energy Commission and the California Department of Housing and Community Development to streamline the titling process for low-income residents seeking weatherization projects in manufactured homes. Many manufactured homeowners in the Eastern Coachella Valley, for example, do not qualify for these projects because they do not have the title to do so.

### **Land Use and Community Development and Transportation**

The Draft must incorporate stronger ties to SB 375 and Sustainable Communities Strategies, which are key plans addressing regional transportation and land-use inequities and changes needed to reduce greenhouse gases. While Appendix A (Climate Justice) recommends a strategy to support local and regional adaptation planning in RTPs/SCSs and General Plans, it does not identify planning policies local and regional plans should be prioritizing, such as infill development and multi-unit affordable housing. SB 375's aim is to create sustainable, resilient communities where residents need not drive long distances to access basic services.

Many smaller, rural communities lack medical services, grocery stores, or schools, and public transit or active transportation infrastructure is virtually nonexistent or unreliable. State recommendations to promote infill development (Recommendation L-6, page 44), must recognize the very distinct needs of rural communities and encourage infill development of resident-identified services and needs. We are pleased to see recommendations focusing on equity and ensuring that vulnerable community members in

rural areas are included in California's equity strategies. Additionally, as rural communities throughout California are projected to see the highest population growth in the coming years, it is important that we consider strategies to conserve agricultural land while still providing residents with the services they need on a daily basis.

The state must also direct more transportation investments to transit operations and active transportation infrastructure in disadvantaged communities. In rural areas where traditional modes of public transit may not be efficient, other innovative models must be considered, such as vanpool and carshare programs.

### **Emergency Management**

According to CalEnviroScreen 3.0, the San Joaquin Valley and Eastern Coachella Valley are home to the top 25% most overburdened and vulnerable census tracts in the state. Hazardous facilities are more likely to be located in low-income communities of color. In the case of extreme weather events, the proximity of ill-equipped communities and potential hazards can result in gas leakages and groundwater threats.

Disadvantaged communities already lack basic water, wastewater, stormwater, transportation, and electricity infrastructure, all of which make emergency response and mitigation difficult. California climate change adaptation strategies must acknowledge these infrastructure needs and consider investment solutions to fulfill them. We recommend that the Draft include a strategy focusing on directing financial, administrative and capacity-building resources to disadvantaged communities that are currently much farther behind than the rest of the state.

### **Biodiversity and Habitat**

California must invest significantly in regions that are geographically vulnerable and currently experiencing air and water quality issues and water scarcity. Severe drought, for example, exacerbates water quality issues and contamination, and such vulnerabilities are barriers to restoring habitat.

It is important that the Biodiversity and Habitat IAP mention the efforts on Carbon Sequestration on Natural and Working Lands led by the California Department of Food and Agriculture and the California Natural Resources Agency. These efforts are acting to improve climate resiliency through conservation management, private sector partnership, and biodiversity and habitat protection, particularly in the area of forestry. This working group is investigating ways to create economic opportunity for working families out of the crisis of climate change, a keystone of building resilience and safeguarding California.

Many of the issues in this section overlap with public health and water and air quality and agricultural land conservation and preservation. Due to agency collaboration and stratification within private industry, we suggest that there be some clarification regarding the applicability of the strategies in this section to working lands. The Draft should incorporate land use and consider strategies to shift from a pattern of sprawl development to compact, infill development in order to preserve habitat.

Thank you for your consideration of these comments. We look forward to continuing to work with the Natural Resources Agency to create a comprehensive climate change adaptation plan that equips communities with the resources needed to build resilience.

Sincerely,

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