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June 7, 2017

Secretary John Laird  
California Natural Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814

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

Dear Secretary Laird and Staff:

Sierra Business Council (SBC) is a non-profit network of more than 4,000 business, local government and community partners working to foster vibrant, livable communities in the Sierra Nevada. SBC hosts the Sierra Climate Adaptation & Mitigation Partnership (“Sierra CAMP”), a public-private, cross-sectoral partnership dedicated to promoting climate action and resilience in the Sierra Nevada region. Sierra CAMP is a member of the Alliance of Regional Collaboratives for Climate Adaptation (ARCCA), which is supported by the Governor’s Office of Planning and Research.

SBC is pleased to provide comments on the *Safeguarding California Plan: 2017 Update – California’s Climate Adaptation Strategy Draft* as well as the opportunity in 2016 to consult with Natural Resources Agency staff on Sierra CAMP’s report, *Sierra Climate Adaptation & Mitigation Partnership Policy Recommendations for 2017 Update of Safeguarding California: Reducing Climate Risk* (attached).

We appreciate the many important elements of this *Draft*, including:

- Comprehensive State Strategies to Safeguard California: we support recommendation CA-5 to, “Prioritize natural infrastructure solutions, actions that both build climate preparedness and reduce greenhouse gas emissions, and projects that produce multiple benefits.”
- Emergency Management: we support the collaborative and integrated approach outlined under the *Emergency Management* sub-section, as well as other sections and recommendations that address holistic approaches to community preparedness such as recommendation F-6.
- Land Use and Community Development: we support recommendation F-4 as a strategy to prioritize rural economic development simultaneously with resiliency efforts and L-4.4 to promote workforce training programs that accelerate the creation of [...] habitat restoration, and sustainable timber harvesting and biomass utilization.
- Biodiversity and Habitat: we appreciate the acknowledgement on page 77 of the role that meadow restoration can play in carbon storage.
- Forests: we support the statement that investments must be made to improve the social and economic resilience of forested communities, and their capacity to carry out forest management activities, including creating jobs to manage forests, harvest biomass, and manufacture wood products. We also appreciate the acknowledgement of the co-benefits of improving forest health and resilience, such as greenhouse gas mitigation, enhanced economic, cultural, and recreational opportunities for communities across the state. Specifically we strongly support the following recommendations:
  - Recommendation F-1: Enhance forest health through fuel reduction, thinning, and managed and managed fire treatments.

- Recommendation F-2: Increase protection of forested lands, reduce conversion to non-forest uses, and facilitate reforestation opportunities to result in a more stable forested land base.
- Recommendation F-4: Promote rural and tribal economic development by expanding wood products markets, biomass utilization, and outdoor recreation.
- Recommendation F-5: Implement sustainable forest management and working forests for the overall health and protection of forested watersheds.
- Recommendation F-6: Foster fire-adapted communities through local planning and fire preparedness.
- Recommendation F-7: Support key research, data management, and monitoring needs in the forestry sector and apply findings through adaptive management

We suggest the following modifications to the *Draft*:

- Energy – While we appreciate the emphasis on biomass utilization in the Forest section, we request that it be explicitly identified in the Energy section as it addresses not only a critical climate need but provides the co-benefits of renewable energy and rural job creation.
- Water – While we appreciate the emphasis of source watershed restoration in the Forest section, source watersheds—and the freshwater storage and filtration services they provide to the State—are not adequately acknowledged in the Water section. By not explicitly addressing source watersheds explicitly in the Water section (beyond the benefit to habitat), the *Draft* risks perpetuating the same public perception disconnect between population centers and critical resources that it seeks to overcome in other education-focused sections. We recommend reframing recommendation W-10 to more clearly acknowledge the water supply benefits of source watersheds in the introduction (e.g. the Sierra Nevada region alone provides approximately two-thirds of the State’s developed water supply) and have the subsequent Next Steps reiterate recommendations F-5 and F-1.3.

Additionally, in order to increase groundwater recharge, increase duration of floodplain inundation decrease annual surface runoff and provide habitat, an estimated 130,000 to 200,000 acres (40 to 60%) of Sierra meadows need restoration, according to the National Fish and Wildlife Foundation’s (NFWF) Sierra Nevada Meadow Restoration Business Plan. Thus, we recommend increasing the mountain meadow habitat restoration goal to meet the non-federal portions of the NFWF plan.

SBC appreciates the Natural Resources Agency’s overall recognition of the importance of the Sierra Nevada region in safeguarding the State and for conducting a local listening session on June 15. We welcome the opportunity to continue to work with your agency on the finalization and implementation of California’s climate adaptation strategy.

Sincerely,



Steve Frisch  
President  
Sierra Business Council



Diana Madson  
Government Affairs Director  
Sierra Business Council