

September 28, 2016

**RE: DRAFT Vibrant Communities and Landscapes: a Vision for California in 2050**

Dear Director Ken Alex and Staff:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments on the DRAFT Vibrant Communities and Landscapes: a Vision for California in 2050.

ARCCA is a network of existing regional collaboratives from across California. Our members represent leading regional collaboratives that are coordinating and supporting climate adaptation efforts in their own regions to enhance public health, protect natural systems, build economies, and improve quality of life. Through ARCCA, member regional collaboratives come together to amplify and solidify their individual efforts, as well as to give a stronger voice to regionalism at the state and federal levels. ARCCA members share information on best practices and lessons learned; identify each region’s most innovative and successful strategies; and determine how these strategies could be adapted to another region’s particular needs. As a result, ARCCA bolsters the efforts of member collaboratives and empowers those interested in forging new regional partnerships. ARCCA’s membership covers nearly 80 percent of the state and includes leading collaboratives from the San Francisco Bay Area, Los Angeles region, San Diego region, Capital (Sacramento) region, and the Sierra Nevada.

We recognize that the development of this vision was a collaborative undertaking by numerous key state agencies and greatly appreciate your efforts in developing a thoughtful vision guided by smart-growth principles and equity considerations. We largely support the goals and actions outlined and offer a few comments that we hope you will find valuable.

1. First and foremost, we appreciate the high-level vision that the State has crafted and, in order to realistically achieve this vision, we encourage the State to develop specific funding mechanisms and incentives to support the policies in this document. Greenfield development remains cheaper and easier to develop, and there are not enough disincentives in place to discourage sprawl. With the loss of redevelopment funding, cities and counties need additional funding and incentives to advance infrastructure projects in existing communities to accommodate higher density projects, active design and transportation, and to reduce other costs to improve and advance reuse, particularly where transit and mixed uses are present or planned for. From a rural perspective, development in the wildland-urban-interface (the “WUI”) continues to be a struggle for the provision of services (including, specifically, home insurance), increased vehicle miles travelled, and for the risk and extreme cost that this type of development poses to wildland firefighting. We encourage the State to create partnerships and incentives that leverage private sector financing to achieve shared goals that build community resilience while protecting private investments. We encourage the State to also work closely with local and



regional agencies to better understand their needs and challenges, as well as to learn from their experiences to accelerate the adoption of innovative strategies, including green infrastructure and other nature-based solutions, and technologies.

2. We recommend the State explicitly discuss the importance of taking current and anticipated climate impacts and risks, derived from the best-available science and models, into consideration at all stages of infrastructure planning, investment, and development. We encourage the State to consider adding to the vision, “Planning and investment decisions at all levels of government help communities build resilience and adaptive capacity to endure and thrive in the face of climate change. Thorough consideration of climate change impacts and risks in retrofitting existing infrastructure and developing new infrastructure, including green infrastructure, effectively and equitably buffer communities from changing climate conditions and effects.” We encourage the State to champion an ecosystems-based approach that articulates the connection between rural, resource-rich but job-poor areas and the more populous urban regions. These resource beneficiaries should be empowered as resource stewards, working with rural communities to increase community capacity and vibrancy across the board. The resources and adaptive capacity present in rural, natural landscapes is an incredible resource, imperative in California’s adaptive planning. This approach has implications on development decisions at both intra- and inter-regional scales. Utilizing regional upstream and downstream considerations in planning and project development is essential for crafting holistic solutions with the greatest benefit for all Californians that improve climate resiliency, livability, public health, equity, and greenhouse gas emissions reduction.
3. We agree that realizing California’s greatest potential requires an integrated vision, but it also requires a departure from past land use practices, a divorce from the conventional urban-rural divide, and a vision that is shared and embraced by – and includes – all Californians. We recommend the State engage with multiple stakeholders at all levels of government, native tribes, landowners and the private sector to refine and implement these policies. We encourage the State to acknowledge the important role that local, regional, public, and private entities play in working together toward California’s 2030 and 2050 climate change goals, and to work with these entities as critical partners in the implementation of these policies. We recommend the State engage in outreach and education activities to increase engagement from city and county elected officials and residents in order to increase support for this model of growth and address concerns about displacement, lack of affordable housing, and equity, as well as some of the underlying reasons behind local government’s approval of development and sprawl, such as growing the tax base and the local political influence of developers. This inclusiveness must also include rural California and those living in the natural and working landscapes of California. It is these communities, and these people, who are closest to California’s most significant resources for adaptation: our soils, our forests, our wetlands and waterways, and our dynamic and iconic vistas.

The high market value of new infill projects near transit demonstrates that urban Californians are eager to live in dense, mixed-use communities with convenient access to active, alternative forms of transportation, but more steps need to be taken to ensure that existing residents are not displaced. In light of California's shortage of affordable housing, state, regional, and local governments should take steps to ensure that highly desirable infill projects do not push low-income residents further and further out, increasing their transportation costs and greenhouse gas emissions while compromising their quality of life. We also encourage the State to leverage existing networks of stakeholders such as ARCCA to help connect with community members from disadvantaged, hard-to-reach, low-income, and/or rural areas.

4. In light of SB32 and the likely downward pressure from the State to local jurisdictions to help reach greenhouse gas emissions reduction targets, we recommend the State to contextualize and provide reasoning for bringing together urban greening, land use, and transportation planning. By purposefully articulating the reasons driving the State to create this vision, we believe the audience will be more receptive to the policies in this document. We recommend including language along the lines of “In the face of climate change, California must act. By mid-century, regions of California are predicted to experience a doubling of extreme heat days over historic norms; other parts of the state may see a quadrupling of days above 95 degrees Fahrenheit. Yet our changing climate need not predetermine a diminished quality of life for California. With proper planning cities can simultaneously improve mobility, cool-down their neighborhoods, improve water supply, provide space for recreation and reduce greenhouse gas emissions—all at the same time. It's not only possible, the goal of *Vibrant Communities* to provide clear direction on this vision.”
5. We encourage the State to put greater emphasis on the importance of urban forestry, tree canopy, parks, green infrastructure and urban greening in low-income and disadvantaged communities. While infill development and increasing density are key strategies to protect natural and working lands surrounding urban areas, reduce greenhouse gas emissions, and lower infrastructure costs, steps should also be taken to improve livability in this type of development. Livability directly impacts health (physical, mental, and emotional.) In order to create truly vibrant, healthy communities, we encourage the State to support the conversion of existing infrastructure to more naturalized systems while discouraging growth-inducing infrastructure expansion outside red lines.
6. We recommend the State add as part of the vision: “California's rural communities are fully integrated as a participant in California's work toward climate sustainability, and these communities benefit from stable economies, the valuation of ecosystem services, healthy natural landscapes, and vibrant and regular communication and coordination with urban centers.”

7. We recommend the State to add as a benefit, “Tangible, short- and long-term benefits for landowners and the public: Development of carbon sequestration and carbon farming practices can expand investments in land conservation and habitat preservation, diversifying the economic base of the state’s agricultural and forest sectors while providing significant public benefits of air and water quality, soil health and open space.”
8. Lastly, we would like to offer additional considerations to help strengthen the State’s vision:
  - a. Strengthen the inclusion of rural communities and natural landscapes throughout the document by identifying mutually beneficial solutions that include the needs and benefits of rural communities and natural landscapes as essential elements of creating a holistic vision for California;
  - b. Recognize the importance of preserving economic and agricultural benefits;
  - c. Include tribes and landowners as critical stakeholders throughout the document;
  - d. Acknowledge the importance of providing resources, infrastructure, services, jobs, training, and technical assistance more equitably to disadvantaged communities in urban and rural areas throughout the state (particularly those facing or affected by historical or legacy disadvantage) to improve resource availability, access to goods and services, amenities, safety, and quality of life;
  - e. Provide specific strategies and projects to promote livable, walkable, beautiful places that are healthy and restorative;
  - f. Reframe the second sentence to remove “most diverse,” as it has become a truism that does not resonate with Californians, and instead include language along the lines of “The most prosperous and populous state in the union, home to vibrant diverse communities, its landscapes...”; and
  - g. Add the following to the list of State planning and policy efforts: *Safeguarding California: Implementation Action Plans, Let’s Get Healthy California, the California Transportation Plan 2040, and implementation of AB 2480 (source watershed protection/restoration) and SB 1386 (protection and management of natural and working lands as a greenhouse gas emission reduction strategy).*

Thank you for your consideration of our comments. We appreciate the collaboration and thought that went into producing this draft vision and look forward to reviewing the final version.

Sincerely,



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*Capital Region Climate Readiness Collaborative*



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