



# ARCCA

Alliance of Regional Collaboratives  
for Climate Adaptation

November 24, 2021

Secretary Wade Crowfoot  
California Natural Resources Agency  
715 P Street  
Sacramento, CA 95814

## **RE: Draft Natural and Working Lands Climate Smart Strategy**

Dear Secretary Crowfoot and California Natural Resources Agency Staff:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments in response to the Draft Natural and Working Lands Climate Smart Strategy (Strategy).

[ARCCA](#) is a California-based network of regional climate collaboratives – each encompassing a diverse, multisector network of agencies and organizations working together to accelerate climate adaptation throughout their region and to catalyze on-the-ground resiliency-building initiatives. As a statewide network, ARCCA brings together thought leaders and practitioners to advocate for equitable and effective adaptation principles and policies, to collaborate towards innovative and holistic solutions, and to build a culture of prioritizing climate and community resilience.

Our member collaboratives represent the following regions: North Coast, Sierra Nevada, Greater Sacramento Area, San Francisco Bay Area, Central Coast, Los Angeles County, and San Diego County. ARCCA is a coalition program of the Local Government Commission (LGC), a 501(c)3 nonprofit working to create livable communities throughout California by advancing policies, connecting leaders, and implementing solutions.

We respectfully offer our comments and recommendations to support the finalization of the Draft Strategy. Our comments are intended to provide high-level recommendations and reflect the diversity of California’s regions and their priorities, as well as the diverse needs and perspectives of local adaptation practitioners. While our network includes over 300 individual public agencies, organizations, businesses, and academic institutions from across the state, the comments provided in this letter are not necessarily endorsed by each of our individual members.



## Overarching Comments

First, we would like to thank you and your team, as well as the other collaborating State agencies, that made the development of the Strategy possible. California’s natural and working lands are critical to achieving carbon neutrality and building resilience to the impacts of climate change that communities are already experiencing, which will only worsen over time without strategic investments and interventions. We look forward to working in partnership with the State and regional stakeholders across California to support the implementation of the Strategy. The final Strategy will be useful for land managers, practitioners, decision-makers and the general public to have access to a concise document showing the path forward for nature-based solutions and how a comprehensive climate smart land management strategy contributes to various State and local priorities.

While the Draft Strategy seems comprehensive, it does not indicate which strategies may be more or less effective or feasible compared to others with respect to emissions mitigation. The 3-year, multi-agency effort led by CNRA to assess the potential contribution of different practices to emissions reduction proposed two scenarios based on available and expected funding. Findings from this effort have been documented in the [Draft California 2030 Natural and Working Lands Climate Change Implementation Plan](#) (which is currently missing from the list of strategies and plans, pp. 16-17). In addition to this document, [a recent study on quantifying the effects of multiple land management practices, land cover change, and wildfire on the California landscape carbon budget](#) explores the potential of individual practices and the uncertainty associated with estimating landscape emissions. While we recognize the tremendous effort that went into identifying and/or quantifying strategies included in the Draft Strategy, it does not seem to leverage or build upon the above-referenced Implementation Plan. We recommend fully leveraging findings and learnings from the previous CNRA-led effort on land management practices and carbon emissions. This can help to ensure that the final Strategy is consistent with best-available science and informed by previous State efforts.

The importance of coordinating across the urban-rural divide to achieve local, regional, and State climate goals should be reflected throughout the Strategy, particularly in the Priority Actions and Approaches and Opportunities to Scale Actions sections. We recommend greater emphasis of the urban-rural connection with particular consideration to the role urban areas could play in supporting priority strategies for preserving and enhancing our state’s natural and working lands. ARCCA’s white paper, [From Mountain to Cities: Exploring California’s Urban Connections to Sierra Nevada Ecosystems](#), explores how communities across California depend on the valuable services provided by Sierra Nevada forests and headwaters, and the risks exacerbated by climate change that endanger these critical natural lands. By recognizing the essential role of rural communities (in the Sierras and beyond) as stewards of California's natural resources – and thereby stewards of the state's economic, environmental, and social vitality – our paper explains why greater investment in and consideration of rural regions by urban communities is critical to the livability and longevity of urban populations, as well as to the achievement of State climate goals.

## Section Two: Work Underway

The summary of State efforts underway related to advancing climate smart land management initiatives for California’s natural and working lands is both comprehensive and concise. However, given the multitude of State plans, strategies, and programs that have been developed, we recommend including links directly in the Strategy to make this section more useful for practitioners. Additionally, a description or flow chart of how various State plans and strategies are intended to work in concert to build climate resilience would be helpful.

## Section Three: Priority Actions and Approaches

We appreciate the concise overview of benefits and priority actions for each landscape, which can serve as useful tools for building public awareness. However, it is unclear which landscapes and strategies should be prioritized to best support the State’s natural and working lands goals. An evaluation of the effectiveness, feasibility, urgency, and expected benefits of strategies across all landscapes would provide helpful guidance to practitioners facing capacity and resource constraints to advance the most important and impactful strategies. Critically, the need for strong strategies to protect against development and encourage conservation is a shared high priority for all landscapes; this could be pulled out and discussed separately in its own section, with an in-depth examination of approaches and strategies to limit the loss and development of natural and working lands.

**Croplands:** Strategies for direct assistance to farmers should also be included here, such as pilot projects, funding, and grantmaking. Many farmers continue to suffer significant losses due to the drought as well as market and supply chain changes brought by COVID-19, such as the closure of restaurants and other large-scale buyers, and resulting low prices for fruit and vegetables due to oversupply. At the same time, farmers face higher costs for materials, boxes, trucking, and especially insurance—[farmers across California have lost insurance coverage](#) as a result of wildfires. Thus, direct assistance, active outreach and engagement, and other strategies may be necessary to encourage farmers to adopt new or unfamiliar soil and farm management practices. Listening sessions should be conducted to understand challenges, concerns, barriers, and assistance needed. This is critical considering the role that California farmers play in not only our economy but also feeding the nation—food security is critical to resilience.

**Wetlands:** We recommend updating Priority C to “...improve groundwater quality *and quantity*...” Additionally, the color used to indicate wetlands in the map (p. 40) is difficult to see, especially if the report is printed in grayscale. We recommend using a brighter color.

**Seagrasses and Seaweeds:** Similar to the above comment, the color used to indicate seagrasses and seaweeds in the map (p. 44) is difficult to see.

**Developed Lands:** While this section discusses parkways, greenbelts, and park management, we recommend that this section directly address park equity and include the creation of parks in under-served, marginalized communities. Park access can support public health, flood resilience, urban heat island reduction, and more. This solution, as well as many others in this section, should also actively incorporate complementary strategies to avoid gentrification; the [Greening without Gentrification](#) report provides examples of these strategies in action.

#### ***Section Four: Tracking Progress and Measuring Outcomes***

Comprehensive monitoring and evaluation are absolutely essential to track progress, measure outcomes, and accelerate the implementation of nature-based solutions. We appreciate the State’s focus on identifying clear metrics and offer a few additional comments for consideration.

**Enabling Policy:** We recommend updating the second policy action, which is currently too vague, to the following: “Ensure policies elevate nature-based climate solutions above others unless infeasible.”

**Additional Metrics for Success:** We recommend adding the following metrics under Social Justice indicators: 1) reductions in urban heat island effects, particularly in low-income, marginalized, underserved, or formerly redlined communities; 2) the number of projects implemented in low-income, underserved, marginalized, and formerly redlined communities, including but not limited to urban forestry projects, parks, community gardens, and green infrastructure; and 3) the number of quality jobs, and training and career opportunities that go to members of low-income, underserved, marginalized, and formerly redlined communities.

#### ***Section Five: Regional Profiles***

We appreciate the inclusion of regional profiles as part of the Strategy, which recognizes the importance of taking a regional approach to preserving and enhancing natural and working lands that span jurisdictional boundaries. To make this section more useful and supportive of the Strategy’s prioritization of equity, we recommend including demographic information in the regional profiles. Including additional information about the region, climate impacts, and public input received will also make the Strategy easier to navigate for regional stakeholders.

#### ***Section Six: Opportunities to Scale Action***

Overall, we are very supportive of the actions identified to scale efforts and create a more supportive environment for the implementation of nature-based solutions. We recommend identifying a responsible party for each action to ensure accountability and to help local and regional practitioners identify the appropriate State agency to coordinate with.

**Partnerships and Collaboration:** Consider adding partnerships with the agricultural sector, as well as partnerships to drive innovative financial strategies such as the Yuba County Water Agency’s multi-sectoral partnerships with public, private, and non-profit partners that enabled it to fund forest restoration through the [Forest Resilience Bond](#).

**Science, Research, Data, and Analysis:** Action #29 (p. 104) seems overly focused on risk rather than the variety of opportunities that multi-benefit projects offer. We recommend a similar recommendation on connecting land use decision makers with technical and analytics resources to help leverage dollars for multi-benefit projects. Demonstrating and quantifying hidden costs and benefits can inform good policy decisions and enable co-funding opportunities.

**Technical Assistance, Capacity, and Outreach:** Actions #59 and #60 (p. 107) should be further prioritized and accelerated to enable deeper engagement and to ensure projects support the self-identified needs of frontline communities. In order to build community capacity, the State should also understand the challenges that existing grant programs pose on smaller community-based organizations (CBOs), particularly resulting from the reimbursement structure of grant payments. We encourage the State to consider providing upfront resources to support CBOs and partnering with philanthropic institutions to increase resources for ongoing CBO operations.

Action #74 (p. 108) could be improved by drawing upon existing data and demonstration projects to increase public awareness and buy-in for nature-based solutions. While we recognize the importance and prioritization of demonstration projects, we also recognize the opportunity to accelerate implementation by scaling out proven solutions. We recommend revising this action to include both new demonstration projects and expanding existing demonstration projects from both within the state and leveraging efforts from outside California.

**Funding, Finance, and Market Mechanisms:** Action #92 (p. 109) should be expanded to include interagency coordination to expedite the permitting of multi-benefit projects of different sizes and scales, not just large-scale restoration projects. Interagency teams should also be convened to review priorities across agencies and determine how mutual goals can be best achieved through multi-benefit projects.

**Workforce and Organization:** Action #120 (p. 111) should be considered high priority and accelerated.

**Incentives and Procurement:** Action #137 (p. 112) is critical to scaling nature-based solutions. We appreciate the emphasis on incentives for the numerous stakeholders that must be engaged, empowered, and involved in order to advance nature-based solutions at the pace and scale necessary. We encourage the State to engage with local governments working to create innovative incentive programs, such as the County of Ventura, as well as review available research on incentive programs, to create effective models that can be replicated throughout the state.



Thank you for the opportunity to review the Draft Strategy and provide comments. We greatly appreciate your time in considering our recommendations and your commitment to conserving, restoring, and enhancing natural and working lands throughout California. Please do not hesitate to reach out to Julia Kim at [jkim@lgc.org](mailto:jkim@lgc.org) if you would like to discuss any of our comments further or if you have any questions.

We look forward to working in partnership with the State and stakeholder across California to support the successful implementation of the State's Natural and Working Lands Climate Smart Strategy.

Sincerely,

A handwritten signature in black ink that reads "Rachel Couch".

Rachel Couch  
ARCCA 2021 Chair  
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A handwritten signature in black ink that reads "Yeshe Salz".

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ARCCA 2021 Vice Chair  
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Julia Kim  
Climate/Energy Program Director; ARCCA Facilitator  
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