

Alliance of Regional Collaboratives for Climate Adaptation
Comments on the Governor's Environmental Goals and Policy Report

May 15, 2014

Ken Alex
Director
Governor's Office of Planning and Research (OPR)
1400 Tenth Street
Sacramento, CA 95814

Re: Governor's Environmental Goals and Policy Report

Dear Director Alex,

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) applauds Governor Brown's commitment to and vision for a comprehensive environmental strategy for the State, as articulated through the draft Governor's Environmental Goals and Policy Report (EGPR). We are grateful for the opportunity to support the Governor's efforts by providing comments on the draft in the spirit of refining this vision for the benefit of all California.

California's Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) was formed in early 2012 out of the urgent need to prepare California's urban centers for the emerging impacts of climate change, including extreme storm events, heat waves, droughts, and sea level rise. ARCCA brings together four regional multi-stakeholder collaborations - The Bay Area Joint Policy Committee, The Los Angeles Regional Collaborative for Climate Action and Sustainability, Resilient Sacramento, and The San Diego Regional Climate Collaborative. The Governor's Office of Planning and Research serves as an ex-officio member, and the Local Government Commission acts as Adaptation Coordinator and Fiscal Sponsor for ARCCA. These regional groups include a wide range of public, private, nonprofit, and academic institutions and are coordinating and supporting local climate partners in projects to enhance public health, protect natural systems, build economies, and improve the quality of life in all communities.

As representatives of regional collaboratives working to address climate change adaptation across California, we felt we could best support your efforts by sharing comments we heard from our regional stakeholders about the EGPR with an eye toward highlighting the particular opportunities and needs surrounding regionalism and regional collaboration, which we feel are essential elements of any comprehensive vision for California's future. These comments arose from sessions held with key stakeholders in our various regions in partnership with OPR staff, as well as ARCCA staff review.

We hope you find these comments and suggestions useful and supportive of your efforts. We welcome any questions you might have.

Sincerely,



Bruce Riordan
ARCCA Chair
Bay Area Climate & Energy Resilience Project



Nicola Hedge
ARCCA Vice Chair
The San Diego Regional Climate Collaborative



Larry Greene
Resilient Sacramento



Krista Kline
The Los Angeles Regional Collaborative

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Overall

- ARCCA believes strongly that regions are a critically important unit of action for environmental protection generally, and for climate change adaptation in particular. With that in mind, this report should more fully recognize the need for regional solutions upfront - especially in light of the state's existing commitment to realizing regional climate mitigation goals through SB375 and the Sustainable Community Strategies (SCS). Alongside this, the report should posit how its recommendations will flow downward into actual planning requirements and policy actions. There is a great need to better align policies across various agencies and their agendas. In support of a vision for alignment and regionalism, the state might consider developing parallel and integrated legislation to AB 32 and SB375 that provides clear direction on addressing adaptation at the state and regional level. For truly effective responses, regional stakeholders need a consistent regional framework in which to develop their response plans. Since the mandated SCS process addresses one aspect of mitigation at a regional scale, it makes sense to expand this framework or replicate it to address adaptation.
- Consideration of climate risks is called out as a factor to be pursued in certain projects in Goal 4. However, to be effective, this consideration would be more effective if it was woven throughout the document. As we look to the future, risks from climate change will become increasingly prevalent; therefore, consideration of these risks needs to be a mainstream practice in new policy and project development across California. Alongside this risk consideration will come a need to bring relevant voices to the table to evaluate those risks because they vary considerably by region.
- Structurally, the report might be stronger if it was rearranged to reflect the hierarchy of action that is needed. Goal 4 "Build Climate Resilience into All Policies" and Goal 3 "Build Sustainable Regions that Support Healthy Livable Communities" should be the leading sections. Goal 4 is the guiding principle under which future action will emerge, and Goal 3 - with its emphasis on strong communities - is the key to success. All else in the report flows from these two. Finally, it seems as if Goal 5 may be better served as a component of Goal 4.

Chapter 1

- Chapter 1 talks about prosperous rural regions and thriving urban areas as a guiding vision around which California's future will be built. However, there is a continuum between rural and urban areas. Regions are comprised of both and in order to realize comprehensive goals we need to integrate activities across them.
- Chapter 1 states that a clean environment is one building block to California's future. Clean air and water, access to healthy foods, open space, and pollution prevention are all worthy goals. Biodiversity of both plant and animal life should also be included in this list.
- The final guiding vision of Efficient and Sound Infrastructure should include green infrastructure as both a climate mitigation and resilience tool.

Chapter 2

- Chapter 2 mentions a mid-term emissions reduction target as a key piece of the state's climate future. Such a target should be set and it makes sense to have the target align with the SB375 regional reduction targets for 2035. This should be linked to the need to "invest in climate readiness and adaptation to safeguard California," through all planning policies and documents. With AB32 in place, and SB375 working towards regional GHG reductions, there needs to be similarly strong policies around adaptation and they need to be linked to regional scale coordination. Making the holistic tradeoffs required to mitigate and adapt requires regional thinking and planning.
- Chapter 2 should also expand on the "interconnectedness" of the elements comprising California's approach to addressing climate change. It is crucial to fuse a strong connection between our mitigation efforts, which include

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state-mandated GHG emissions reductions, and our resilience and preparedness efforts, which are currently being developed by our local and regional authorities, utilizing state guidance in various ways.

Chapter 3

- We note that changing demographics – which are highlighted on page 12 – are often regional in nature. It is important to think about demographic changes not at the jurisdictional or state level but at the regional level where these changes are most apparent and distinct.
- It is also important to note how important it is to utilize a wide variety of communication tools to effectively exchange ideas and impart information to our changing population.
- In talking about the importance of preserving and protecting our state's natural infrastructure, enhancement of these systems should also be made a priority.

Chapter 4 – Goal 1: Decarbonize the State's Energy and Transportation Systems

- The included sub-goals reflect a large number of existing legislative commitments, and therefore do not set out an agenda for improving the state. These goals should go beyond the status quo.
- There is a missed opportunity to call out regional alternative transit sub goals here (e.g. increased walking, biking, public transit).
- With regard to key action #1, it is absolutely vital that regional representatives participate in any such processes. Including regional stakeholders will help to identify increased coordination opportunities with local jurisdictions.
- With regard to key action #4, set goals for energy efficiency in building stock at the regional level to enable greater flexibility in designing incentives and meeting goals.
- With regards to key action #7, alignment of investments with goals set forth in SCSs is a very important point. However as noted in the overall comments, alignment should be woven throughout this document as a guiding principle, as all state investments should be aligned with SCSs and support them.
- The metrics could be improved if they included regional coordination and regional outcomes.

Chapter 4 – Goal 2: Preserve and Steward State Lands and Natural Resources

- Ecosystem linkages are best measured and managed at the regional scale, and we encourage the EGPR to integrate regional ecosystem planning and services as a goal, and look to identify ways to integrate ecosystem planning and services into other planning processes so each process can reinforce the other.
- With regard to Key Action #1, consider proposing a regional vision for land acquisition. Consolidation of land acquisition functions at the state level is a good thing, but coordination across regions to link related land goals and uses would support better environmental outcomes overall. It is also important to note the vital role wildlife corridors and linkages play in sustaining biodiversity.
- With regard to Key Action #3, in support of the concept that better management of natural resources is key to “weathering changes”, this action could note that the best management of these systems will occur at a regional scale and be conducted in concert with regional partners.
- With regard to Key Action #4, balancing multiple objectives through innovative land use planning is central to effective stewardship of natural resources, and this point could be the cornerstone of the whole natural resource goal.
- With regard to Key Action # 5, given the importance of water to California's vitality, should this be its own goal?
- Additional actions to mention should include dual metering and the use of greywater (is that how you spell that?).

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- Further, Key Action #5 notes that water system stability “will require cooperation across boundaries and disciplines so that water supply projects provide multiple benefits.” As noted above, this cross-cutting theme should be integrated comprehensively throughout the EGPR.

Chapter 4 – Goal 3: Build Sustainable Regions that Support Healthy and Livable Communities.

- If we take the position that “[h]ealthy and sustainable communities are the cornerstones of the state’s long-term goals” at face value, this really should be a much stronger element of the whole EGPR, and likely should be integrated throughout the vision much more strongly. Such a reconfiguration is important for two reasons: 1) it puts people at the forefront of our considerations as measured by their collective health and well-being; and, 2) it looks at regions as the primary unit of evaluation for this assessment.
- With regard to Key Action #1, if we are to build strong regions, state investments must be coordinated regionally. These intentions should be carried into the design of Key Action #2, so that allocation of funding is - as noted - “in alignment with environmental goals,” but this alignment should ultimately be coordinated with and measured against regional planning activities and regional outcome measures.
- Another priority under Key Action #2 should be investment in new state parks located in, or in close proximity to, park-poor and socially and environmentally vulnerable neighborhoods.
- Our schools can provide additional beneficial community services including gardens, open space, and safe zones.
- The outcome measures for this goal should be more robust and tie back to the investment frameworks that are embedded across the key actions for this goal. For example, a measure of progress on Key Action #1 would be the scale of regional infrastructure investments and their corresponding impacts in regional resiliency.

Chapter 4 – Goal 4: Build Climate Resilience and Preparedness into All Policies.

- As noted above, this is a principal position for California to take and is what guides the state’s actions with respect to the environment. Therefore, it should be the primary goal. Furthermore, if we are indeed taking steps to prepare for an inevitably more challenging environment through adaptive measures, the state should lead with a level of commitment commensurate with its commitment to mitigation. Consider signaling a desire to move towards mandatory adaptation policies to complement the rigor and commitment of AB32.
- If we take seriously the notion that “Preparedness and consideration needs to be built into new planning processes, but also incorporated into ongoing planning efforts,” we also must integrate greater capacity for uncertainty (through flexible, responsive regional scale guidelines) at the same time as we dramatically increase risk management capacity (through coordinated vulnerability assessments and evidence driven option analysis).
- While the key actions in this section are valuable and important, the link to building resilience into all of the policies is lost. Each of these actions is beneficial by itself, but there need to be more actions that specifically examine state policies, seek to identify gaps in resiliency integration, and work to move integrated policies forward at the state level.
- With regard to Key Action #1, risk management is an important area for research. Further research in this area will inform action based on outcomes of vulnerability assessments.
- With regard to Key Action #2, monitoring information and projections need to be more widely available and better understood, and it will be important to work with regional and local organizations to advance this action because they will base their planning on them.
- With regard to Key Action #3, it is important to go beyond testing; the state needs to institutionalize outcome sharing and refinement. Taking success to scale is a primary role for the state, and should be embodied in this action.
- With regard to Key Action #4, rather than relegating this to a single key action focused on identifying research and information needs (which is a one way flow, not a true partnership) it would be more effective to generalize integration of local/regional partnerships across the whole section.

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- With regard to Key Action #5, funding is obviously a central need to move adaptation forward. This key action should address financing in the context of existing state resources, in addition to a gap analysis of need versus available funding. Also, consider restating this action to focus on integration of adaptation planning into relevant existing and future funding.
- With regard to Key Action #6, consideration of climate risks should be a factor in all significant projects. Alongside this consideration comes a need to have relevant local voices evaluate those risks because they vary considerably by region.
- With regard to the indicators and measures for this goal, it is unclear how integrating resiliency into state policies will be measured. In light of this, consider developing indicators that address: coordination (both across state agencies, and with regional stakeholders); risk management (e.g. through insurance, capital investment, business integration of adaptation planning); and, the alignment between scenarios and actions on the ground at the regional level (e.g. measuring how well development is responding to future risks).