November 23, 2021

California Natural Resources Agency
Amanda Hansen, Deputy Secretary for Climate Change
715 P Street
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RE: Recommendations for Advancing Equity and Environmental Justice in California's Natural and Working Lands Climate Smart Strategy

Dear Deputy Secretary Hansen,

We thank you for the opportunity to provide recommendations for California's draft Climate Smart Strategy. Our coalition offers these equity-focused recommendations as a supplement to the comment letter we submitted in September of this year. Moving forward, we hope to work collaboratively to ensure California can successfully meet its ambitious climate, access, biodiversity, equity, conservation, and public health goals.

While the following recommendations are high-level, we believe each will meaningfully support the advancement of equity throughout every stage of implementation of the Climate Smart Strategy. Additionally, we must explicitly note the need for regional specificity as each human and biological community faces its own issues.

Advancing Equity In the Climate Smart Lands Strategy

Equity Must Be Interwoven Into All Aspects Of The Climate Smart Lands Strategy

While many of California's disadvantaged communities experience lack of healthy and accessible green spaces, they are also more likely to be located closer to polluted places with less capacity to adapt to disproportionate climate impacts. In order to address California's history of racism and contemporary environmental crises, California Natural Resources Agency and all relevant agencies involved with the implementation of the Climate Smart Strategy must ensure that equity provisions are included in all programs and projects. This recommendation is consistent with the goals set in Executive Order N-82-80 to "advance equity and opportunity for all regions in California" and to "accelerate natural removal of carbon and build climate resilience in our forests, wetlands, urban greenspaces, agricultural soils, and land conservation activities in ways that serve all communities and in particular low-income, disadvantaged and vulnerable communities."

Despite citing high-level equity goals, this document does not currently incorporate equity into the proposed policies and actions holistically or explicitly. CNRA must address this document-wide concern by prioritizing the voices, needs, and priorities of communities of color, indigenous communities, and economically disadvantaged communities. Specifically, equity must be considered in revising, adopting, or establishing policies, regulations, grant criteria, and expenditures.

Additionally, CNRA must ensure the policies approved in the Climate Smart Strategy reduce barriers for benefits and funding for tribes, disadvantaged landowners, and other historically marginalized members of the community. To reach the disadvantaged communities of all regions, CNRA must also ensure programmatic consistency of equity policies across all ecosystems in the document.

Establish Long-Term Funding For Environmental Protections And Land Management Actions

While it's understandable that the draft Climate Smart Strategy does not include much detail on the scale of investments and the funding mechanisms that will be utilized to advance its policies, it should acknowledge that long-term funding is critical to the program's success. Historically, state agencies have been intermittently or chronically underfunded despite their critical organizational missions. To address this structural funding concern, CNRA must work to assess the funding gap and pace needed to meet the State's climate and public health goals by 2030 and develop a proposal for adequately funding program implementation over the next eight years. Secure funding will support long-term project benefits, promote effective monitoring of progress, and adequate

resources for land management to meet the accelerated scale of investment needed to reach our climate, biodiversity, conservation and public health goals.

Establish A 50% Investment Baseline For Rural And Urban Disadvantaged Communities

To ensure that direct benefits reach people of color, low-income residents, tribal communities, and other marginalized populations in both rural and urban communities, CNRA must establish a 50% investment baseline for these communities across all programs and ecosystems identified in the Climate Smart Strategy. We additionally recommend that this 50% be met each year across all programs to ensure there is no unreasonable delay in the benefits reaching these communities.

Co-Benefits and Enhanced Ecosystem Services In DACs Will Be An Effective Metric For Measuring Successes

The Climate Smart document can improve overall ecosystem services and should take into account and re-establish natural processes that once allowed humans, wildlife, and ecosystems to thrive and maintain a deep connection to one another. This document should specify that nature-based resilience projects are priorities in disadvantaged communities.

Due to the inherent properties of nature-based solutions, direct investments for climate resilience will lead to additional co-benefits for the environment within disadvantaged communities. Green infrastructure projects, for instance, can provide recreational space within underserved communities, while also helping to store, filter, and even supply water while also sequestering carbon. Not only do these projects help provide essential city services and improve quality of life, they are also most adaptive in addressing major climate impacts. We recommend that CNRA adequately account for the various co-benefits and enhanced ecosystem services provided by implementation of the Climate Smart Strategy as critical metrics of success.

Ensure Strong, Long-Term Environmental Protections In All Ecosystem Types

Protecting public health and the environment from harmful land management practices or climate stressors will be essential in reaching long-term climate resilience. Durable protections and reforms of land management practices will be essential in ensuring these benefits are long-lasting and consistent.

Support A Just Transition And A Green Economy

The Climate Smart Lands Strategy must also align with ongoing efforts to promote a green economy and jobs for local community workers, including career pathways in natural resources management and outdoor recreation.

As written, the draft strategy does not include policies for phasing out practices that emit additional carbon and greenhouse gases. This action must be prioritized to protect communities and the environment from additional emissions that exacerbate climate stressors and run contrary to the mission of the Climate Smart Strategy.

Renewable energy projects should also be designed with best practices that prevent adverse impacts to people and wildlife and support carbon sequestration with hedgerows. With this transition from polluting industry and practices, the state can play an active role in ensuring California's disadvantaged communities are not left behind as the economy shifts to meet our ecological needs.

Expand Access Wherever Possible

Although not all projects under the Climate Smart Lands Strategy will qualify for expanded access, CNRA should work with willing landowners to open private natural and working lands for sustainable forms of access. These forms of access should include community gardens, community land trusts, waterways, coastal access trails, culturally relevant and ecological educational opportunities, bike paths, foot trails, campsites and nature watching. If areas are not considered for access, CNRA should provide a clear explanation and demonstrate that there was an effort made to gather sufficient and meaningful community input on alternatives that balance conservation goals with public access.

Leverage Working Lands for California's Public Health, Climate, and Biodiversity Goals

To more strongly incorporate equity into the Climate Smart Lands Strategy, CNRA must leverage its programs to support other public health and environmental programs in other state and local agencies. For example, this document can support the AB 617 Community Air Monitoring Program by leveraging climate smart practices to support improved air quality from pesticide, dust, valley fever, and other respiratory illnesses. These practices can also support the Human Right to Water and other water-related impacts such as drought and flooding.

CNRA must also consider Public Health, Climate, and Biodiversity goals in project prioritization. We recommend weighted scoring for projects that yield additional co-benefits for disadvantaged communities.

Reduce Barriers to Public Participation

The 30-day comment period for the Climate Smart Strategy was not transparently advertised ahead of the public release of the document and no clear explanation was given for the specific length. While we appreciate the extension announced before the first proposed deadline, this short period has strained even full-time staff dedicated to following the CSS and there was no public hearing despite various other opportunities to participate virtually earlier in the year. To ensure adequate time to provide thoughtful comments we recommend that CNRA standardize a comment period to 45 or 60 days at minimum. We also request that the future draft documents be translated into additional languages and that hearings to provide comment are also held.

Tracking Progress and Measuring Outcomes

Measurable Outcomes for Equity Must Be Transparent, Enforceable, and Time-Bound

We are supportive of CNRA's commitment to advance equity in conservation. To effectively advance equity, we insist that CNRA incorporate equity metrics into all of its projects and program evaluations. Metrics should also be as universal as possible while allowing the flexibility for regional needs.

As previously stated in our September letter, metrics for success should be clearly established and measure success at every stage of the Climate Smart Strategy. Each project should have a clear articulation of the co-benefits and who/what is expected to benefit and if metrics of success are not met, CNRA must ensure programs can be adapted to better meet the goals of the Climate Smart Lands Strategy.

We also urge CNRA to prioritize funding for programs and projects that offer clear articulations and accounting mechanisms for tracking equity. At a high-level, metrics should also track specific project benefits and beneficiaries. Specifically, metrics for success should ensure equity in terms of public process, improved public health, ecological function, and biodiversity for disadvantaged communities since these co-benefits will be natural results of the types of nature-based projects proposed by this document. Success metrics should also be contrasted with a baseline assessment which accounts for differences between urban and rural communities.

Furthermore, metrics should be time-bound to encourage accountability in the roll-out of these projects. CNRA should also include yearly goals for each priority action in the final document. Ensuring timely rollout of programs will be necessary to ensure DACs receive project benefits as soon as possible.

Accountability and Regular Reporting

CNRA should produce an annual equity report tracking progress and identifying barriers to implementation of programs and the advancement of equity metrics relating to the Climate Smart Strategy. These reporting and measuring efforts can be met with innovative partnerships that include community members, local interested stakeholders, and other governmental agencies. One notable example includes Outdoor Outreach's update to the *Parks for Everyone Report.*[1] The results of these efforts must be made with transparency to the public and must be integrated into adaptive management frameworks to ensure the flexibility needed to adjust program implementation in real time.

Ensure Adequate Funding for Monitoring

In order to ensure that tracking efforts match the increased scale of projects needed to meet the goals issued in the Executive Order, we urge CNRA and other relevant agencies to adequately fund long-term measurement of benefits. It is currently extremely challenging to fund monitoring for projects, including tracking progress and measuring success. Even restoration projects on federal lands do not often include or incorporate funding for post construction monitoring or evaluation. Without developing and ensuring funding, it will be almost impossible to have demonstration projects in disadvantaged communities that showcase how projects showcase climate smart adaptation strategies either successfully or unsuccessfully.

Funding sources need to be secured for all the components identified in the CSS including development of a monitoring open access database and funding the entities that will be charged with doing the monitoring. A centralized database is a great idea but it will require a lot of investment in training and input in order for groups to agree to use it. We also support community science and closing data gaps pertaining to disadvantaged communities.

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[1] https://www.google.com/url?q=https://www.sdfoundation.org/wp-content/uploads/2020/09/TSDF-Parks-for-Everyone-2-Report.pdf&sa=D&source=docs&ust=1636303152203000&usg=AOvVaw3G1ynecMihS7fGRb6kZYIa

Opportunities for Scaling Action

While there are many important policies proposed in Section Six, our coalition supports the following policies in particular as especially critical to advancing equity goals across the state. We believe that effective program development and agency-wide implementation of these policies can advance aspects for historically marginalized communities throughout all of California.

Advancing Access to Nature's Benefits

4. Launch a partnership dedicated to greening every school yard in California, prioritizing schools in climate vulnerable communities.

> Comment: CNRA should establish partnerships with schools to support data collection and monitoring on local adaptation strategies.

76. Support regular and sustained access to nature for California's youth through schools, community-based organizations, recreational opportunities, and more.

90. Support park projects in disadvantaged communities, including in rural and unincorporated communities, including for operations and maintenance.

> Comment: We support the consideration of operations and maintenance into the CSS since costs are often a barrier for small and low-income communities. We suggest further examination into other barriers to expansion of park projects in disadvantaged communities such as land acquisition.

96. Explore long-term stable and dedicated funding sources for natural climate solutions; target and prioritize resources for tribal governments and historically disadvantaged communities; re-examine current funding regimes and modify them as needed to prioritize funding for community organizing and engagement. It is important to recognize and address the barriers that may limit access to funds, such as processes that require extensive application knowledge and time, as well as funding through reimbursement that limits the opportunity to only those who are able to fund up front.

> Comment: Current funding regimes must be re-examined to ensure investments reach California's urban and rural disadvantaged communities. We support a 50 percent set-aside for all programs relating to the implementation of the Climate Smart Strategy.

135. Inventory unmaintained, dilapidated buildings to identify opportunities for replacement with community greenspace consistent with anti displacement measures.
>   Comment: This inventory should be expanded to include vacant lots and other properties appropriate for replacement with community greenspaces.

Leverage Natural and Working Lands for Multiple Benefits

5. Set climate smart land management goals on publicly and privately owned lands.

21. Support communities and local governments to identify opportunities to support climate action on California's natural and working lands that also deliver on local/regional environmental, equity, and economic priorities.
>   Comment: This policy can advance equity by providing weighted scoring for grant applications that support meaningful community engagement and strong buy-in with local stakeholders.

34. Research ecosystem services valuation to account for the benefits of nature-based climate solutions in California. For example, ensure that nature-based carbon sequestration projects in critical watersheds account for and utilize the value of resulting water savings. Incorporate pricing strategies into state investment decision making to value land-based systems and benefits not currently captured.

45. Support studies that analyze impacts of climate change on natural resource availability, especially groundwater.

58. Identify measurable economic or public health benefits to disadvantaged or low-income agricultural workers, including improved safety associated with the use of safer, more sustainable pest management tools and practices or increased wages due to higher organic commodity prices as a result of intersecting conservation and climate efforts.

64. Analyze engagement of climate vulnerable communities in efforts to support climate smart land management, to understand whether adjustments in the outreach approach to these partners are needed.

67. Support large-scale restoration and stewardship of less productive agricultural landscapes for climate resilience through funding and the development of guidance and implementation strategies.

79. Create a toolkit to advance inclusion of cultural heritage into climate vulnerability index assessments to create more holistic, intersectional, and larger landscape tools to inform climate action decisions.

88. Include paid opportunities for community members to participate and contribute to climate smart land management such as native species planting, landscape restoration, and community science initiatives.

115. Identify and consider whether landowners eligible for climate smart land management funds live in disadvantaged communities rather than simply location of company offices, and whether investment will directly benefit the local community.

116. Explore the development of a Nature- Based Solutions Workforce Development Program that is connected to regional and sector strategies and prioritizes job-seekers from climate vulnerable communities. Convene regional roundtables to identify opportunities that support local priorities as well as the hiring needs of nature-based solutions employers offering quality jobs.

121. Create an advisory council or taskforce to support identification of any structural inequities in nature-based solutions initiatives, and opportunities to address them. Require training and resources for staff to understand the history of racism and inequity in the natural resource sector.

122. Include measurable metrics and targets to ensure support for efforts of climate vulnerable communities to scale nature-based climate solutions.

136. Review existing incentives to identify and amend those that have unintended consequences for the health of our natural and working lands.

142. Financial incentives for implementing climate smart land management should include requirements that benefit workers and nature. These actions must be intentional, with agreements developed to ensure communities are benefiting from projects as intended.

147. Convene an internal working group to identify opportunities to integrate nature-based solutions into existing efforts and review existing nature-based solution efforts to ensure they are contributing to our collective climate change goals.

156. Prohibit or strongly disincentivize large-scale clearing of native habitats.

157. Evaluate how to phase out and ban chemicals (like glyphosate and many others) that cause biodiversity loss, chronic illness, and widespread pollution in our air and waterways.

159. Implement new policies that acknowledge and respect tribal jurisdiction and rights for traditional, cultural, subsistence, and commercial harvesting, gathering, and management in all state lands, including coastal waters and state parks.

172. Expand safer, more sustainable pest management alternatives to harmful pesticides and support the increased reliance on biological pest control to protect worker and public health, and support scaled up training for integrated pest management technical assistance providers.

174. Require use of local native plants in state-funded projects involving landscaping and/ or plants, with the opportunity to provide exceptions if clearly justified (for example, for urban forestry programs and the Healthy Soils Program)

176. Consider stricter density in local planning and zoning requirements to safeguard undeveloped land and promote infill development.

183. Prioritize agroecological practices in agricultural climate smart land management efforts; maximize climate, public health, and economic benefits to climate vulnerable communities.

184. Prioritize programs and projects that promote safer, more sustainable pest management practices and tools and reduce the use of harmful pesticides, promote healthy soils, improve water and air quality, and reduce public health impacts. In addition, support strategies that achieve co-benefits of safer, more sustainable pest management practices and the health and preservation of ecosystems.

Incorporate Public Health Into Land Use and Management Practices

24. Partner with local health departments, tribal health consortia, and other public health partners to maximize the health benefits of nature-based climate solutions.

Ensure Long-Term Funding for Climate Smart Strategy Implementation

35. Convene California experts to estimate the funding gap to implement nature-based climate solutions needed to deliver ambitious climate action on our natural and working lands.

84. Support historically disadvantaged small-scale farmers in climate smart land management through, for example: farmworker cooperatives and land trusts; first-time farm ownership assistance for former farmworkers, tenant farmers, and historically disadvantaged new and beginning farmers; grants and zero/ low-interest loans and capital assistance programs; tribally-led land-based projects; and additional financial and technical assistance programs.

100. Explore tribal set asides, such as tribal-only grants, formula, and non-grant funding opportunities to support tribes as partners in implementing the EO.

150. Establish an equity framework for climate smart land-related resource allocation. This would involve identifying climate vulnerable communities and prioritizing resources for them (ex. funding, loans, incentives, facilities, training, jobs, and leadership/ decision-making opportunities).

152. Add job creation, job access, and responsible employer/contractor measures (e.g., standards and targets) and job quality to procurement contracts that support climate smart land management in CA.

Building Local and Regional Capacity to Accelerate Nature Based Solutions

60. Launch a Nature-Based Solutions Technical Assistance Initiative to support and increase the capacity of California landowners, Native American tribes, land managers, communities, and others to accelerate climate smart land management in California.

66. Develop guidance on ways to elevate climate smart land management strategies in local (City and County) land use and related plans, such as General Plans, Climate Action Plans, transportation and community resilience plans, groundwater sustainability plans, drought response plans, hazard mitigation plans, and housing plans.

173. Address barriers for implementing climate-smart practices for farmers, particularly historically underserved farmers, who lease land on agricultural land owned by non-operating landowners.

Conclusion

Thank you for your consideration of these comments. We look forward to collaborating with the State and other stakeholders to successfully implement the Climate Smart Natural and Working Lands strategy. We would appreciate meeting at your earliest convenience to discuss our concerns and to elaborate on our comments in additional detail. Please contact Pedro Hernández at pedro.hernandez@audubon.org to facilitate meeting scheduling.

Sincerely,

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