

January 28, 2014

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Little Hoover Commission
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Re: Climate Change Adaptation Study

California is recognized as a global leader on addressing climate change and is involved in a host of policies, programs, and plans intended to prevent, prepare for, and adapt to climate change. These measures are spread across a range of agencies, departments and sectors encompassing a wide spectrum of strategies targeted at reducing greenhouse gas emissions while simultaneously helping California to respond to the unavoidable and escalating impacts of a changing climate (what is often called “Adaptation”). Given such a large and diverse portfolio of climate change strategies and plans scattered across state government, we believe that the state’s efforts can be more effective if they are guided by a shared set of goals and principles to coordinate their design and implementation.

An additional option would be to establish a California Climate Commission to oversee the many and sometime disparate efforts, enhance coordination and maximize effectiveness. This Commission should have both government and public members and include scientists, local government, urban activists and environmental group representatives. It would absorb the existing Climate Action Team and establish mechanisms for public participation and accountability.

Below, we propose a set of Core Goals and Climate-Smart Principles to guide state climate planning activities that include establishing a preference for natural infrastructure as a climate change adaptation response, a proven, cost effective strategy and a priority for the Nature Conservancy.¹ Adopting these goals and principles across all state climate activities will result in better plans and create a foundation for genuine collaboration and coordination amongst the many departments and agencies involved in addressing this global challenge.

The climate is changing and impacts are happening now, both here and around the globe. The time has come for comprehensive and integrated plans and actions that include nature-based, Climate-Smart solutions to help California and its communities reduce the source of the problem and prepare for the changes that will escalate in frequency and severity over time.

¹ See attached report, “Reducing Climate Risks with Natural Infrastructure.”

Core Goals for A Comprehensive Climate Change Program for California

1. Goals: We recommend that the state adopt the following core set of goals to provide direction and focus to its efforts and to promote continuity among the various entities and plans focused on addressing climate change. These goals could also be adopted by a new California Climate Commission (CCC) to guide its work.

1. Assess vulnerabilities and risks from climate change
2. Increase the resilience of the state's built and natural environments
3. Increase the state's preparedness for extreme climate events
4. Protect public health from the effects of climate change
5. Protect California wildlife and habitats from the effects of climate change
6. Maximize restoration, and protection of natural resources to reduce risk of extreme events and carbon pollution
7. Create resilient communities through public information, outreach and planning
8. Reduce, avoid and track greenhouse gas emissions and reductions
9. Facilitate advancement of science and tools to support research, planning and policy in CA
10. Serve as a global model and share lessons learned to leverage action beyond state borders

Climate-Smart Principles for Policy Makers and Planners

We also recommend the state adopt this set of Climate Smart Principles for Planners and Policy Makers presented below and apply them to all state decision making including plans and permits where appropriate. Like the core goals, adoption of these principles will help the state or a new Climate Change Commission prepare California to cope with the impacts of climate change effectively and to do so most efficiently by promoting coordination amongst the sectors.

Climate-Smart strategies and actions specifically address impacts of climate change in concert with other threats and promote nature-based solutions to:

- Reduce risk to human and natural communities, and enhance ability to adapt
- Reduce greenhouse gas (GHG) emissions and enhance ecosystem services
- Sustain vibrant, diverse communities and ecosystems over time

2. Climate-Smart Planning Principles:

1. **PLAN AHEAD TO REDUCE RISK FROM EXTREME EVENTS** – Decision makers should avoid approving new projects or development in areas that would be at increased risk from climate change impacts, especially from extreme events like flood, wildfire, and sea level rise. Prevention is the easiest and cheapest strategy to safeguard Californians from the risks of extreme events exacerbated by climate change. The state should not make large capital expenditures without evaluating the potential risk posed by climate change. The goal is straightforward: keep people and wildlife out of harm's way. Be smart – don't build in places likely to be at risk from future climate impacts. This principle should also be

recommended to local government because local land use decisions are key in determining the patterns of growth on the landscape and can play a crucial role in reducing risk from climate change to people, private property and natural resources. The state's plans and subsequent implementing actions should rely on comparative analyses of various scenarios to reduce unavoidable impacts focusing on Climate-Smart actions that reduce risk, are cost effective and maximize benefits.

2. **FOCUS ON FUTURE CONDITIONS, not the past. Potential climate changes and their impacts should be considered in planning and projects over a meaningful time horizon, at least up to 2050.** The scale of the potential impacts and the level of uncertainty today necessitate consideration over several decades. Longer-term planning can help agencies avoid mal-adaptation - actions that might work today but in the long run, inhibit or prevent future climate adaptation actions that are identified as the climate changes. The plan and subsequent decisions should use a range of plausible future scenarios, including extreme ones, to address uncertainty in both near- and long-term time frames.
3. **PRIORITIZE NATURAL INFRASTRUCTURE over engineered actions where feasible. Agencies should establish a preference for natural infrastructure or nature-based responses to the maximum extent feasible including restoration, conservation and projects on agricultural land, forests, wetlands, and grasslands.** This policy is a good mechanism to catalyze cross-sector, cost-effective action. Natural, or "Green" responses can provide many benefits in addition to reducing risk to people and resources from climate driven extreme events. For example, natural responses like forest conservation can provide benefits to the atmosphere and help regulate the climate by reducing or avoiding emissions of greenhouse gas (GHG) and increasing carbon sequestration over time as the trees continue to grow while also protecting drinking water supply and quality. Green responses can also provide additional economic, recreational, habitat, and cultural benefits. Often they can be cheaper and quicker to implement than engineered, or grey, responses. Green responses can also be used as a first step, delaying the time and the extent of an eventual grey response. Priority should be given to these multi-benefit actions.
4. **COLLABORATE & COMMUNICATE ACROSS SECTORS** – identify activities that meet goals of multiple sectors like water and energy or forests and biodiversity; establish and expand non-traditional alliances to accelerate effective problem solving (e.g., between/among public and private resource managers, scientists, decision-makers); share knowledge, communicate openly, convey hope; engage local communities, e.g., youth, to instill Climate-Smart planning ethic for long term success.
5. **DESIGN AND GIVE PRIORITY TO ACTIONS THAT PRODUCE MULTIPLE BENEFITS -** Adopt landscape or watershed scale analyses; focus on natural system function and services in addition to risk reduction including water and food security, habitat for fish and wildlife, recreation, jobs, and quality of life amenities.
6. **QUANTIFY THE GREENHOUSE GAS EMISSIONS REDUCED AND AVOIDED** – Evaluate changes in carbon stocks and give preference to actions that also help address the source of climate change – GHG emissions. This information will also be important in securing

more funding by fully informing the climate benefits of the various activities. The ultimate objective is for these actions to have an overall net environmental benefit.

7. [EMPLOY ADAPTIVE AND FLEXIBLE APPROACHES](#) for most timely, effective responses to continual change in climate, ecology and economics; include adaptive management framework with regular monitoring and reassessments to actively apply learning from what works and what doesn't.

3. Additional recommendations to Little Hoover Commission

- **The state should require that all of its major capital outlay projects of \$500,000 or more be informed by a climate impact and risk management analysis up to the year 2050.** This action will help the state make fiscally sound and prudent investments in its efforts to reduce the risk of climate-magnified extreme events.
- **Planners should implement equitable adaptation measures,** and consider that the impacts of climate change will be borne by those least able to respond. Priority should be given to the most vulnerable of communities.
- **CEQA guidelines should be amended such that all Environmental Impact Statements and Mitigated Negative Declarations effectively incorporate considerations of climate change adaptation with support from the state's climate mapping tools such as Cal-Adapt.** This will enable agencies to robustly analyze proposed actions, project alternatives, and potential mitigation actions as well as their long-term feasibility as they relate to climate change.
- **In designing and implementing responses to climate change, state planners and decision-makers should quantify the economic benefits from the activity including those from the full suite of nature's services to the greatest extent possible.** This information will be important in allocating scarce resources cost effectively, in building support for climate action generally, and potentially, in securing funding for climate change response actions.
- **The state should adopt new mechanisms that create greater transparency in state climate change-related decision-making and create opportunities for meaningful public input.** The Climate Action Team should adopt mechanisms to create transparency and accountability including quarterly public meetings and an external, public advisory committee.
- **State agencies should integrate climate change into their standard business practices.** State agencies have a responsibility to address arguably the most significant disturbance factor facing California.

- **All state climate planning efforts should be consistent with the many other state, regional, and national climate response planning processes currently underway such as the National Fish, Wildlife and Plants Climate Adaptation Strategy.** Applying these goals and Climate-Smart Principles described above will result in just such coordinated, cost effective, efficient planning that will help reduce risk to California from the escalating impacts of climate change.
- **Planners should establish a process for future monitoring and evaluation of the efficacy of state actions taken to address climate change.** This will provide planners and stakeholders with a method to identify successful strategies and areas that need improvement.
- **The state should adopt a policy that gives priorities to actions based on lowest risks and maximum benefits,** prioritizing “no risk” actions, which have a high probability of producing beneficial climate adaptation outcomes and little or no-risk of failure to implement successfully.

Thank you for your consideration of our comments and for your work on this most important issue. Should you have questions or wish to discuss any of these recommendations, please do not hesitate to contact me at 415-281-0439 or by email at lblumberg@tnc.org.

Sincerely,

Louis Blumberg, Director
California Climate Change Program