



November 23, 2021

Wade Crowfoot, Secretary for Natural Resources
 Amanda Hansen, Deputy Secretary for Climate and Energy
 California Natural Resources Agency
 715 P Street, 20th Floor
 Sacramento, CA 95814

RE: Comments on DRAFT Climate Smart Strategy – Blue Carbon/Coastal Habitats

Dear Secretary Crowfoot and Deputy Secretary Hansen,

On behalf of the undersigned environmental protection and conservation organizations, we are writing to express our support for the California Natural Resources Agency's (CNRA) draft Natural and Working Lands Climate Smart Strategy and offer suggestions for its robust implementation to ensure we act on climate now, empower people, and plan for the future of California's "working coasts."

We stand ready to support your efforts to take bold action to achieve California's appropriately ambitious goals related to greenhouse gas reductions, climate adaptation, and biodiversity. We firmly believe the scientific expertise, processes, and resources needed for implementation are available to begin taking action immediately on the recommendations below. We applaud initial efforts and encourage sustained action and attention to achieve these important targets.

Recommendation 1: With respect to natural lands, prioritize efforts that maintain these existing carbon sinks and avoid further loss through robust protections and reducing threats.

Recommendation 2: Prioritize place-based conservation, protection, and restoration of California's tidal wetlands and submerged aquatic vegetation like eelgrass beds as a focal nature-based solution and support research and monitoring needed to inform adaptive management of these habitats.

Recommendation 3: Work with the California Air Resources Board (CARB) to improve the state's accounting for blue carbon – the carbon stored in habitats like tidal wetlands, salt marshes, and eelgrass meadows – in the current and future Natural and Working Lands greenhouse gas inventory and include these ecosystems in nature-based targets and pathways currently being developed as part of CARB's 2022 Scoping Plan Update that will contribute to carbon neutrality goals.

Recommendation 4: Partner with California Native American Tribes and commit to specific measures related to co-management, enhancement of cultural resources and traditional foods, and Indigenous Knowledge.

Recommendation 5: Ensure that local communities, particularly climate-vulnerable frontline communities, are meaningfully involved in planning and implementation of climate smart decision-making to ensure equity, sustainability, and economic resilience.

Recommendation 6: Develop plans and set targets for protecting undeveloped areas, and adapting the existing built environment where necessary, to adapt to sea level rise including protecting inshore areas to accommodate landward migration of coastal habitats.

Recommendation 7: Strengthen the regulatory framework for coastal development activities and projects to avoid, minimize, and mitigate impacts to important coastal habitats. This could include developing stronger guidance on avoidance of impacts and mitigation strategies for the loss of carbon storage in impacted habitats.

Recommendation 8: Accelerate environmental restoration consistent with CNRA's "Cutting the Green Tape" initiative by speeding permitting processes for restoration projects and nature-based solutions while ensuring best practices are employed to mitigate social and environmental impacts of restoration projects.

California's coastal habitats are a critical ally in responding to climate change, reducing greenhouse gases, and supporting biodiversity. These ecosystems, when healthy, provide these and a diverse set of additional ecosystem services that are essential for humans and marine wildlife. California has lost an estimated 90% of its wetlands after decades of diking, draining, dredging, damming, development, and other impacts. Eelgrass meadows have faced extensive loss in the state due to excess sedimentation resulting from land use practices, pollution, and direct impacts from coastal infrastructure. Protection, conservation, and restoration of these habitats is necessary for California to meet the challenge of climate change and to ensure we do not release stored carbon back into the atmosphere.

We applaud CNRA for developing the draft Climate Smart Strategy and appreciate its recognition of the role that coastal habitats can and should play in California's efforts to fight climate change. Please deliver a strong final strategy that includes specific, actionable steps for California's Natural Working Lands and Waters.

Thank you for your time and consideration of this important issue.

Sincerely,

Valerie Ventre-Hutton Legislative Analyst 350 Bay Area Action	Daniel Chandler 350 Humboldt Steering Committee 350 Humboldt	Nicole Kemeny President 350 Silicon Valley
Alison Waliszewski Policy & Outreach Manager 5 Gyres Institute	Thomas Anderson Administrative Director Amigos de Bolsa Chica	Michael Lynes Director of Public Policy Audubon California
Andrea Leon-Grossmann Director of Climate Action Azul	Dennis Simmons President Beach Ecology Coalition	Rich Block President California Association of Zoos and Aquariums
Susan Jordan Executive Director California Coastal Protection Network	Robert Mazurek Executive Director California Marine Sanctuary Foundation	Andrea Williams Director of Biodiversity Initiatives California Native Plant Society
Larry Hanson President California River Watch	Rachel Norton Executive Director California State Parks Foundation	Rebecca Spector West Coast Director Center for Food Safety
Carol Kerridge Advisory Committee Member City of Del Mar Lagoon Committee	Jonathan Parfrey Executive Director Climate Resolve	Tegan Hoffmann Executive Director Coastal Quest
Mark Silberstein Executive Director Elkhorn Slough Foundation	Dan Silver Executive Director Endangered Habitats League	Ashley Eagle-Gibbs Conservation Director Environmental Action Committee of West Marin

Melissa Mahoney Senior Manager, Climate Resilient Fisheries & Oceans Environmental Defense Fund	Michael Wellborn President Friends of Harbors, Beaches and Parks	Zoe Siegel Director of Climate Resilience Greenbelt Alliance
Kim Lewand Martin Associate Director Los Angeles Waterkeeper	Amy Wolfrum California Ocean Policy Senior Manager Monterey Bay Aquarium	Ivy Munnerlyn Coastal Programs Coordinator Northcoast Environmental Center
Stacey Chartier-Grable Executive Director OC Habitats	Greg Helms Program Manger, Fish Conservation Ocean Conservancy	Courtney Vail Campaign Director Oceanic Preservation Society
Melissa Ward Research scientist San Diego State University & UC Davis	James Smith Board President San Dieguito River Valley Conservancy	Kathy Schaeffer Legislative Coordinator San Fernando Valley Climate Reality
Erica Donnelly-Greenan Executive Director Save Our Shores	David McGuire Director Shark Stewards	Justin Lindenberg Executive Director Stewards of the Coast and Redwoods
Laura Walsh California Policy Manager Surfrider Foundation	Ellie Cohen CEO The Climate Center	Antonina Markoff Coordinator The Climate Reality Project California State Coalition
Gilly Lyons Officer Conserving Marine Life in the U.S., Pacific The Pew Charitable Trusts	Richard Popchak Communications and Development Director Ventana Wilderness Alliance	Angela Kemsley Conservation and Communication Manager WILDCOAST

cc: Jared Blumenfeld, Secretary for Environmental Protection
Mark Gold, Deputy Secretary for Ocean and Coastal Policy
Jordan Diamond, Ocean Protection Council member
Michael Brown, Ocean Protection Council member
Mark Stone, State Assemblymember
Ben Allen, State Senator
Cyndi Dawson, Castalia Environmental