



April 30, 2015

Via email: [comments@scc.ca.gov](mailto:comments@scc.ca.gov)

Sam Schuchat, Executive Director  
State Coastal Conservancy  
1330 Broadway, Suite 1300  
Oakland, CA 94612

Dear Mr. Schuchat,

The mission of The Big Sur Land Trust (BSLT) is to inspire love of the land and conservation of our treasured landscapes. The Coastal Conservancy is an important partner to our organization. Over the past three decades BSLT's continued success is due in large part to the unflagging strategic and financial support of the Coastal Conservancy. We are pleased that Proposition 1 funding enables you to keep supporting critical conservation work throughout California.

On behalf of The Big Sur Land Trust, thank you for the opportunity to submit the following comments on the Coastal Conservancy's 2015 Strategic Plan Update dated 03/12/15.

### **Overarching Comments**

- The 2015 Strategic Plan Update ("Update") provides detailed explanation about the connection between the 2013 – 2018 strategic plan previously adopted by the Coastal Conservancy Board of Directors in December 2013 and the legislative direction required by Proposition 1 funds available for the Coastal Conservancy ("Conservancy") to fund an ecosystem, watershed protection and restoration program. Several priorities required by Proposition 1 language and developed by the Coastal Conservancy for Proposition 1 funding seem to provide a framework for the disbursement of Proposition 1 funds. We will be interested to see how these newly documented priorities (as compared with the Conservancy Proposition 1 guidelines provided earlier in 2015) mesh with the overall solicitation process and the 16 strategic plan goals.

### **Proposition 1 Priorities**

- The Update states that "Proposition 1 directs the Conservancy to prioritize projects that benefit disadvantaged communities, achieve multiple benefits and result in quantifiable outcomes." The Update also identifies four priorities, established by the Conservancy for Proposition 1 expenditures - water sustainability, anadromous fish, wetland restoration and urban greening. We hope the Conservancy will consider how to weave these stated priorities into the grant evaluation and scoring criteria to be employed for reviewing grant applications for this program. While some elements of the seven priorities (i.e., the four priorities identified by the Conservancy plus the three project priorities directed by Proposition 1) highlighted in the Update were included in the evaluation and scoring

criteria in the Coastal Conservancy's draft grant program guidelines (02/2015 draft), we suggest that a more direct connection would help the Conservancy achieve the priorities in the Update.

### **Wetland Restoration**

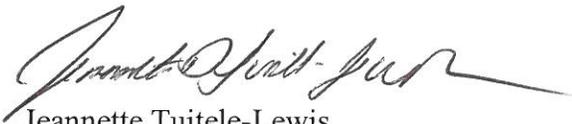
- This section suggests an emphasis for support of wetland restoration projects that take place in the San Francisco Bay. Of the four studies cited as plans to inform prioritization of wetland restoration projects, three focus on the Bay Area and the other in southern California. This language along with revised numeric goals listed in the table under Goal #5 (page 8) indicate that wetland restoration projects outside the Bay Area are less of a priority for the Conservancy. Wetland restoration projects are needed along the entire California coast. If possible, we suggest the Conservancy consider including North Coast and Central Coast wetland restoration projects in a more deliberate manner.

### **Revised Goals**

- Thank you for providing specific information about the revised numeric goals for various goals and objectives in the strategic plan. Has any progress been made in reaching any of the specific metrics provided for the plan's 2013 goals/objectives? If so, please consider providing that information in the tables as well. If not, it would be helpful to make that point clear as well.
- Is there a threshold for funding support from Proposition 1 if the Conservancy reaches a goal listed in the Update? Will the Conservancy be providing real time information to grant applicants if such a threshold exists? For example, if Proposition 1 funds enable the Conservancy to meet the goal of Objective 5G in the Update and support 12 projects to "improve water quality to benefit coastal and ocean resources" in the Central Coast before the entire amount of Proposition 1 funds have been expended, will prospective grant applicants seeking support for that type of project no longer be able to receive funds?

Again, BSLT appreciates the opportunity to collaborate with the Coastal Conservancy as you focus your strategic growth areas to best support conservation in California. We look forward to a continued successful partnership with you as we advance important conservation projects in the Carmel River, the Salinas Valley and other key areas in the central coast of California. Please contact Rachel Saunders, BSLT Director of Conservation at 831-625-5523 x.109 or [rsaunders@bigsurlandtrust.org](mailto:rsaunders@bigsurlandtrust.org) or me at 831-625-5523 x 100 or [jtuitele@bigsurlandtrust.org](mailto:jtuitele@bigsurlandtrust.org) with any questions.

Sincerely,



Jeannette Tuitele-Lewis  
President/CEO  
The Big Sur Land Trust

## Exhibit 2: Public Comments on Draft Update



### **OFFICERS**

*President*  
Jennifer Thomas  
*Vice President*  
Dan Kalmick  
*Treasurer*  
Jim Anderson  
*Secretary*  
Marinka Horack

### **BOARD OF DIRECTORS**

Roberta Armstrong  
Roger Bloom  
Connie Boardman  
Dr. Gerald Chapman  
Dr. John Doyle  
Dave Hamilton  
Mikel Hogan, Ph.D.  
Flossie Horgan  
Mike McMahan  
Jayson Ruth  
Marc Sturdivant  
Laurel Telfer  
Karen Merickel-Wood

*Executive Director*  
Kim Kolpin

### **ADVISORY BOARD**

Debbie Cook  
Nancy Donaven  
Norma Gibbs  
Bob Goodrich  
Janice Kellogg  
Patricia Martz, Ph.D.  
Eileen Murphy  
Linda Moulton Patterson  
Rochelle Pazanti  
Louis Robles  
Dr. Richard Sax  
Grace Winchell

### **ENDORSEMENTS**

Amigos de Bolsa Chica  
Algalita Marine Research  
Foundation  
Anza Borrego Foundation  
Ballona Wetlands Land  
Trust  
City of Huntington Beach  
City of Seal Beach  
Friends of Harbors,  
Beaches and Parks  
Huntington Beach  
Wetlands Conservancy  
Huntington Beach Tomorrow  
Orange Coast League of  
Women Voters  
Orange County  
Coastkeeper  
Peninsula Open Space Trust  
Sea and Sage Audubon  
Sierra Club  
Angeles Chapter  
Surfrider Foundation

April 30, 2015

Via email: [coments@scc.ca.gov](mailto:coments@scc.ca.gov)  
Sam Schuchat, Executive Director  
State Coastal Conservancy  
1330 Broadway, Suite 1300  
Oakland, CA 94612

Dear Mr. Schuchat,

On behalf of the Bolsa Chica Land Trust, thank you for the opportunity to submit the following comments on the Coastal Conservancy's 2015 Strategic Plan Update dated 03/12/15. We are in support of all of the goals and objectives outlined in the Strategic Plan Update, and are excited to see the important and innovative work which will result. We do have a few comments on the Plan Update, specifically we would urge the consideration of support to coastal resources in Southern California which bear the burden of being in many cases highly impacted by urban development.

The Wetland Restoration section of the Plan Update suggests an emphasis for support of wetland restoration projects that take place in the San Francisco Bay. Of the four studies cited as plans to inform prioritization of wetland restoration projects, three focus on the Bay Area and the other in southern California. This language along with revised goals listed in the table under Goal #5 indicates that wetland restoration projects outside the Bay Area are less of a priority for the Conservancy. Wetland restoration projects are needed along the entire California coast. If possible, we suggest the Conservancy consider including North Coast, Central Coast and South Coast wetland restoration projects in a more relevant manner.

Our Southern coastal wetlands are severely impacted. There is increased urban stress and our coastal wetlands are in need of preventative and restorative care. At Bolsa Chica for example, the wetlands are surrounded by rapidly increasing density of urban sprawl. Bolsa Chica is faced with erosion, siltation and tidal flow control mechanism maintenance issues which need to be addressed for the continuing functioning of the habitat.

We greatly support Goal 5, particularly for the protection, restoration and enhancement of wetland adjacent uplands. Our upland ecosystems are a critical part of the healthy functioning of our coastal wetlands. The opportunity Proposition 1 gives to restore our coastal sage scrub, coastal terraces, forests and coastal prairie habitats is significant and we urge that this support is administered to all of the coastal areas, not just those surrounding San Francisco Bay.

## Exhibit 2: Public Comments on Draft Update

The upland habitat at Bolsa Chica and many of the other Southern Coastal wetland areas are degraded and highly impacted. The wildlife that use both wetland and adjoining uplands have limited resource support. The uplands of Bolsa Chica support raptor and songbird habitat, a rare native plant species, and trails. These acres as you know, took significant effort to be saved from development. These uplands now have the potential to be restored to thriving native coastal prairie, but only with help and financial support. We urge you to support the increase in goals for the South Coast and include upland habitats in your focus.

More than 30,000 annual visitors use Bolsa Chica for passive recreational use, in addition to the diverse wildlife usage of the Reserve, which means that much is demanded from a relatively small wetland/upland system. We are not alone in this situation, and although we see need throughout all coastal areas in the State, the Southern coastal areas are faced with staggering impacts and need the support given through Proposition 1.

We are grateful for all of the hard work and dedication you and your team give to protecting the California coast's natural resources. We appreciate the opportunity to present our comments to you for your consideration.

Best regards,



Kim Kolpin  
Executive Director



April 25, 2015

California State Coastal Conservancy  
1330 Broadway, 13th Floor  
Oakland, CA 94612-2530

**Re: Draft Strategic Plan Update**

Dear California State Coastal Conservancy,

Thank you for the opportunity to comment on the Conservancy's Draft Strategic Plan Update. We understand that the Conservancy is updating the Plan in part to include priorities for Proposition 1 expenditure.

Proposition 1, approved by voters in 2014, will provide \$100.5 million to the Conservancy to fund multi-benefit water quality, water supply, watershed protection and restoration projects over the course of a decade.

Funds for the Coastal Conservancy are included in Chapter 6 of Proposition 1, which requires that: "For restoration and ecosystem protection projects funded pursuant to this chapter, the services of the California Conservation Corps or a local conservation corps certified by the California Conservation Corps shall be used whenever feasible" (Division 26.7 of the Water Code, Chapter 6, Section 79734).

The requirement to use conservation corps helps ensure that project dollars are spent in ways that protect California's natural resources and also benefit the state's most underserved young people and the disadvantaged communities in which they live.

Pursuant to the Conservancy's Proposition 1 Grant Program Guideline development process, the California Association of Local Conservation corps has already commented and provided suggestions to the Conservancy on how it might integrate this requirement into its grant-making process.

In addition to ensuring that this requirement is part of any grant guidelines, we encourage the Conservancy to reference it in the Plan alongside any other important Proposition 1 directives. In this way the Conservancy would emphasize that its goals are consistent with the voter-approved law, and provide applicants a clear signal as to eligibility requirements and funding prioritization.

Conservation corps have decades of experience working efficiently and effectively alongside state and local partners to achieve tremendous results for California's natural resources. We are at the ready to work on projects that support the Conservancy's top priorities funded via Proposition 1.

Thank you for your consideration; for any questions or more information about these recommendations or conservation corps please contact Crystal Muhlenkamp at [crystal@caleec.com](mailto:crystal@caleec.com).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Alan Lessik', is written over a light blue horizontal line.

Alan Lessik

President California Association of Local Conservation Corps

## Exhibit 2: Public Comments on Draft Update

**From:** [Pat Mapelli](#)  
**To:** [SCC Comments Email](#)  
**Subject:** Draft Strategic Plan Update - Comments  
**Date:** Monday, April 27, 2015 12:01:18 PM  
**Attachments:** [3475\\_001.pdf](#)

---

Good afternoon:

Thank you for providing the public the opportunity to comment on the Draft 2015 Coastal Conservancy Strategic Plan Update. It was good to see that the Proposition 1 water bond provided millions of dollars to support water quality, water supply, watershed and restoration projects. Cargill has been a significant supporter of these types of projects which is apparent through our transfer of tens of thousands of acres of land to the resource agencies for ecological, water quality, watershed and restoration uses.

Although the water bond funds will contribute a significant amount of money towards these types of projects, it is clear that this is significantly less than is needed just to complete the restoration work on the 16,500 acres that Cargill transferred to the resource agencies 12 years ago. With that said, and since the Coastal Conservancy is the lead agency on the South Bay Salt Pond Restoration Project (SBSPRP), the funds now available through the Proposition 1 water bond should be used towards the restoration of the 16,500 acres. Acquiring additional properties with these funds prior to restoring what is already in public ownership is not a good use of the public's money.

Therefore, a general comment on the Draft Plan is that all funds should be used towards restoration of properties already within the public's ownership for the improvement of water quality, water supplies, watershed and restoration projects. There also seems to have been a significant increase in Plans, Projects and Acres from the 2013 Goal yet there is no specificity where, what or why these additional Plans, Projects, and Acres are being added. The public should be made aware as to the where, what and why these additional Plans, Projects, and Acres are being recommended by the Coastal Conservancy prior to the end of the comment period. This would be one way for the tax payer to understand how, where and why these funds are being proposed for use.

Lastly, I have attached an exhibit from the Draft Appendix 1 – Map of Disadvantaged Communities. The shading needs to be removed from Cargill's Redwood City Plant Site – the same as Cargill's Newark Plant Site is shown.

Should you have any questions for me, I can be reached at (510) 790-8610 or alternatively you can email me.

Sincerely,

Pat Mapelli  
Manager, Real Property  
Cargill Salt  
7220 Central Avenue  
Newark, CA 94560



Comments COASTAL CONSERVANCY Draft Strategic Plan Update due 5.1.2015

Four new priorities were added in this Strategic Plan Update. They are:

- *Water Sustainability*
- *Anadromous Fish*
- *Wetland Restoration*
- *Urban Greening*

These priority issues *achieve multiple benefits, serve disadvantaged communities, and result in quantifiable outcome.*

We do not have definitions for:

- Water Sustainability
- Urban Greening
- Multiple Benefits
- Quantifiable Outcome

There needs application of this Strategic Plan Update to have results that show proper use of the funding in the execution of the Proposition language.

Your Mission states:

*The Coastal Conservancy acts with others to preserve, protect, and restore the resources of the California coast, ocean, and the San Francisco Bay Area. Our vision is of a beautiful, restored, and accessible coastline, ocean and San Francisco Bay Area.*

Goals and Objectives restated are:

**Objective 2H:**

*Complete the Santa Ana River Parkway and Open Space Plan*

**Goal 7: Climate Change Resilience**

*Enhance the resiliency of all coastal and San Francisco Bay Area communities and ecosystems to the impacts of climate change and implement greenhouse gas reduction projects.*

**Objective 7B:**

*In cooperation with public agencies, universities, non-governmental organizations and local residents, use the best available science to conduct site-specific, regional and landscape-level sea level rise, flooding and extreme storm event vulnerability assessments, and develop adaptation plans and strategies that address threats to coastal communities and public infrastructure in ways that protect natural resources and provide maximum public benefits*

**Objective 7C:**

*In cooperation with public agencies, universities and non-governmental organizations, use the best available science to conduct site-specific, regional and landscape-level vulnerability assessments of upland ecosystems and waterways, and develop adaptation plans to address predicted climate change impacts to natural resources, streamflows, biodiversity, and critical habitat.*

We comment:

**Objective 2H:**

Santa Ana River Parkway and Open Space Plan is not in the Proposition language, but the Santa Ana River watershed is. Including a specific plan is too binding unless you have LEAD AGENCY jurisdiction. The surface body itself is not in your jurisdiction.

**Goal 7: Climate Change Resilience**

Resiliency has no definition and appears to have no measurability or accountability.

**Objective 7B:**

Best available science may be no science or no scientific data/studies available. The term *regional and landscape-level sea level rise* has no meaning. Sea-rise means flooding or erosion.

You plan to *develop adaptation plans and strategies that address threats to coastal communities and public infrastructure in ways that protect natural resources and provide maximum public benefits*. That is occurring already. *Adaptation* has no definitive definition. This is a process that needs to be clearly defined and understandable to the public.

You exclude the public in the process.

**Objective 7C:**

You plan to *conduct site-specific, regional and landscape-level vulnerability assessments of upland ecosystems and waterways, and develop adaptation plans to address predicted climate change impacts to natural resources, streamflows, biodiversity, and critical habitat*. Upland ecosystems are not usually part of the coastal regions and is usually outside your delegated territory.

You exclude the public in the process.

**Chapter 6: Protecting Rivers, Lakes, Streams, Coastal Waters & Watersheds** purposes involve only six of the 15 goals:

**Goal 2: Coastal Accessways, Parks, Trails and Open Space**

Expand the system of coastal public accessways, open-space areas, parks and inland trails that connect to the coast.

**Goal 5: Coastal Watersheds**

Enhance biological diversity; improve water quality, habitat, and other natural resources within coastal watersheds

**Goal 6: Coastal Working Lands**

Enhance coastal working lands, including cropland, rangeland and forests.

**Goal 7: Climate Change Resilience**

Enhance the resiliency of all coastal and San Francisco Bay Area communities and ecosystems to the impacts of climate change and implement greenhouse gas reduction projects

**Goal 11: Natural Habitats and Open Space Resources**

Protect and enhance natural habitats and connecting corridors, watersheds, scenic areas, and other open-space resources of regional importance in the Bay Area

**Goal 13: Working Lands and Stewardship**

Protect Bay Area working lands and support farmers and ranchers in implementing stewardship of the natural resources on their lands.

You fail to address natural lands including wetlands. Greenhouse gas reduction projects are mentioned but not the Greenhouse Gas Carbon Inventory. Water quality improvement needs to be quantified, as it is under the State and Local Water Boards jurisdiction.

Joyce Dillard  
P.O. Box 31377  
Los Angeles, CA 90031



P.O. Box 3283 Fremont, CA 94539  
tel (510) 490-1690  
www.earthlawcenter.org

May 1, 2015

Samuel P. Schuchat, Executive Officer  
The Coastal Conservancy  
1330 Broadway #1300  
Oakland, CA 94612  
**VIA ELECTRONIC MAIL:** [comments@scc.ca.gov](mailto:comments@scc.ca.gov)

Re: Comments on Coastal Conservancy Strategic Plan Update

Dear Executive Officer Schuchat:

Earth Law Center (ELC) welcomes the opportunity comment on the California State Coastal Conservancy's (SCC) draft Strategic Plan Update.<sup>1</sup> The Strategic Plan Update provides an important opportunity to carry out Proposition 1 as well as the California Water Action Plan<sup>2</sup> and Safeguarding California,<sup>3</sup> particularly as the proposed changes encourage multibenefit ecosystem and watershed protection and restoration projects. ELC requests the SCC to revise its draft Strategic Plan Update in two ways: first, to call for greater inter-agency collaboration and activity in order to maximize the potential benefits of overlapping Proposition 1 funding and mandates; and second, to revise the four identified priorities to more closely achieve the goals of healthy coastal waterways and anadromous fish populations.

**I. The Draft Strategic Plan Update Should Place a Greater Emphasis on Inter-Agency Coordination and Leveraging of Funds toward Implementation of Multibenefit Projects**

As discussed in more detail in our SCC Proposition 1 Guidelines comments dated March 19<sup>th</sup> (attached to this letter for reference), ELC requests the SCC to revise the draft Strategic Plan Update to further prioritize inter-agency collaboration that supports multibenefit projects (*e.g.*, those that achieve ecosystem restoration, flood protection, improved flows, and so forth).

Such prioritization is consistent with the direction of Proposition 1 and the California Water Action Plan, as discussed in the attached letter. It is also consistent with Safeguarding California, which states that "actions that reduce climate risks across multiple sectors and actions that address multiple climate risks should be prioritized." It adds that, "[s]ignificant cross-agency coordination and collaboration will be needed to identify and implement [climate] risk reduction opportunities with multiple benefits."<sup>4</sup> There are numerous benefits from greater inter-agency collaboration, including enhanced compliance with Proposition 1's focus on collaboration to maximize fund utility and leveraging of all existing funds; achievement of better results for the

---

<sup>1</sup> <http://scc.ca.gov/webmaster/ftp/pdf/Conservancy%202015%20Strategic%20Plan%20Draft%20Update.pdf>.

<sup>2</sup> [http://resources.ca.gov/docs/california\\_water\\_action\\_plan/Final\\_California\\_Water\\_Action\\_Plan.pdf](http://resources.ca.gov/docs/california_water_action_plan/Final_California_Water_Action_Plan.pdf)

<sup>3</sup> [http://resources.ca.gov/docs/climate/Final\\_Safeguarding\\_CA\\_Plan\\_July\\_31\\_2014.pdf](http://resources.ca.gov/docs/climate/Final_Safeguarding_CA_Plan_July_31_2014.pdf).

<sup>4</sup> *Id.*

environment for less cost; and further movement towards fulfilling the SCC's mission to "act[] with others to preserve, protect, and restore the resources of the California coast, ocean, and the San Francisco Bay Area." (Emphasis added.) Additionally, SCC programs that embrace inter-agency collaboration have already proven to be successful, such as the OPC/Coastal Commission/SCC Local Coastal Program Sea-Level Rise Adaptation Grant Program.<sup>5</sup>

The draft Strategic Plan Update does speak to inter-agency collaboration to some extent already. For example, it states that the SCC "will seek to align its funding and project priorities with other state agencies administering Proposition 1 funding for related objectives." The draft Strategic Plan Update then describes how the CDFW, Wildlife Conservation Board (WCB), and California Department of Water Resources (DWR) will administer grants for particular project types.

However, these statements do not call for the deeper levels of inter-agency coordination reflected by the agency and department heads at the February 10th Assembly Water, Parks and Wildlife hearing nor in the California Water Action Plan or Safeguarding California. There are numerous ways the SCC can better prioritize inter-agency collaboration and activity in order to maximize overall benefits of Proposition 1 spending. For example, the Strategic Plan Update could include a clear statement of intent to prioritize inter-agency collaboration across the board. Other California agencies already include such language in their own strategic plans; for example, the OPC's Five-Year Strategic Plan (2012-2017) specifically calls for the OPC to "[i]ncrease inter-agency coordination and collaboration...."<sup>6</sup> The SCC should similarly call for a deeper level of inter-agency coordination, such as with the following proposed language:

In order to "produce the greatest public benefit" with Proposition 1 funding, the SCC will strengthen and expand inter-agency coordination, including by reaching out to other state agencies with related Proposition 1 funding sources – such as the CDFW, WCB, OPC, SWRCB, DWR and others – to establish, as is appropriate and beneficial, shared and/or jointly funded efforts.

ELC also urges the SCC to call for additional inter-agency collaboration within its four identified priorities for Proposition 1 spending. For example, the SCC states under the "anadromous fish" priority that "[t]he Conservancy has and will continue to coordinate with National Oceanic and Atmospheric Administration and the [CDFW] on identifying priorities." However, instead of planning for more of the same, the Strategic Plan Update could call for *greater* coordination, such as through the following language: "[t]he Conservancy will expand coordination with National Oceanic and Atmospheric Administration, [CDFW], and other agencies, including by establishing collaborative, inter-agency projects as appropriate." By making these and other changes throughout its draft Strategic Plan Update, the SCC can better promote multibenefit projects that achieve the intent of the Proposition 1, the California Water Action Plan, Safeguarding California and the SCC's own mission.

---

<sup>5</sup> [http://www.opc.ca.gov/webmaster/ftp/pdf/docs/LCP2013/LCP\\_SLR\\_Program\\_Announcement\\_FINAL.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/docs/LCP2013/LCP_SLR_Program_Announcement_FINAL.pdf)

<sup>6</sup> See California Ocean Protection Council, "A Vision for Our Ocean and Coast: Five Year Strategic Plan, 2012-2017," p. 7, at: [http://www.opc.ca.gov/webmaster/ftp/pdf/2012-strategic-plan/OPC\\_042412\\_final\\_opt.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/2012-strategic-plan/OPC_042412_final_opt.pdf).

## II. The Four Identified Priorities Should Be Strengthened to Better Achieve Healthy Waterways and Anadromous Fish Populations

The draft Strategic Plan Update identifies four priorities for Proposition 1 expenditures: water sustainability, anadromous fish, wetland restoration, and urban greening. ELC offers recommendations for each priority area, in addition to line-edits for each priority description.

### **Water Sustainability**

As recognized by the Wild Salmon Center, "[c]oastal watersheds are among the most productive biological communities on earth."<sup>7</sup> However, freshwater flows – the lifeblood of coastal habitats – are oftentimes severely inadequate due to over-diversion (particularly in light of drought), dams and other barriers, groundwater over-pumping, upstream land uses that drain and channel waterways, saltwater intrusion and climate change.

In order to achieve coastal watershed health while still meeting community water needs, ELC asks the SCC to place a greater emphasis on protecting and restoring flow in coastal waterways. To do so, ELC suggests the following revisions to the draft Strategic Plan Update.

*Advance the sustainable use and management of water in coastal watersheds in order to achieve ~~conservation benefits~~ **healthy ecosystems** and increase climate resiliency.*

- Seek implementation of projects that meet the objective of “protecting and enhancing flow in severely dewatered coastal waterways and/or waterways that are critical habitat for threatened or endangered anadromous fish.” This would supplement (or replace) the existing objective of “protecting summer flows for salmonids and other aquatic species” by emphasizing necessary flow increases at other times of the year, and by calling for not only flow “protection,” but also “enhancement.”
- Revise the possible multibenefit sustainability project of “instream flow dedication” to prioritize “permanent instream flow dedication.” Permanent, rather than temporary, flow restoration is better able to prevent future off-stream diversions and fully address ongoing flow challenges.
- List “improved surface and ground water management” as a possible multibenefit water sustainability project. The SCC and other state agencies must recognize that California will never achieve actual “water sustainability” under the current water rights system. For example, a 2011 Public Policy Institute of California report found that “[w]ithout reform, current water policies and institutions virtually guarantee that California will experience five major, protracted water crises...” – namely, extinction and decline of native species, catastrophic floods, water scarcity, deteriorating water quality, and the decline of the Sacramento-San Joaquin Delta (“Delta”).<sup>8</sup> To begin to address these water management challenges, the SCC should work with other agencies to explore water management

---

<sup>7</sup> Wild Salmon Center, “Why is Salmon Conservation Important?,” at: <http://www.wildsalmoncenter.org/about/whySalmon.php>.

<sup>8</sup> See Ellen Hanak *et al.*, “Managing California’s Water: From Conflict to Reconciliation,” PCIP (2011), at: [http://www.ppic.org/content/pubs/rb/RB\\_211EHRB.pdf](http://www.ppic.org/content/pubs/rb/RB_211EHRB.pdf).

alternatives, following the lead of states like Oregon<sup>9</sup> and Washington<sup>10</sup> that have established instream water rights. The SCC should also collaborate with the CDFW, WCB, State Water Resources Control Board (SWRCB), and other agencies to conduct pilot projects for new water management systems, particularly in coastal waterways.

### **Anadromous Fish**

Coastal watershed health is pertinent to the well-being of anadromous fish – including salmon, which have been called the “best species indicator of coastal ecosystem health.”<sup>11</sup> Unfortunately, anadromous fish species have suffered significant declines over the last several decades. Many species are now threatened or endangered with extinction due to reduced flow, barriers to fish migration, habitat modification (including negative impacts to crucial spawning and rearing habitat), water quality degradation, and other pressures. ELC urges the SCC to make several revisions to the draft Strategic Plan Update to better address these threats.

*Restore habitat, including flow, needed for achieving the health of anadromous fish populations.*

- Recognize that anadromous fish species are critical to overall ecosystem health and that they possess inherent value. Currently, the draft Strategic Plan Update describes coastal salmon and steelhead as “an important resource,” “an important part of the local economy in some coastal areas,” “an important food source,” and as being “culturally important to tribes.” Unless California begins to recognize the value of anadromous fish and other aquatic species apart from their human utility, we will continue to marginalize their well-being in our planning and policy decisions.
- Call for greater coordination on securing instream flows to support anadromous fish. The SCC wisely commits to supporting projects that “secure instream flows with appropriate volume and temperature to support anadromous fish.” To receive additional, necessary guidance for this task, the SCC should coordinate with the SWRCB, OPC and other agencies to determine, based on science, the amount of flow that is necessary for fish to survive in waterways. Such determinations should be based on existing flow studies wherever possible (to avoid additional, unnecessary delay), and otherwise determined on a regional basis with an acceptable methodology, such as a “percent of flow” approach.
- Explicitly support projects that protect and restore areas identified as current or potential “salmon strongholds.” The “stronghold approach” targets “core centers of wild salmon abundance and diversity.”<sup>12</sup> In pursuing this strategy, the SCC could work with the CDFW, the North America Salmon Stronghold Partnership (a public private-consortium with well over a dozen members<sup>13</sup>), and others.
- Recognize that inadequate flow is a fundamental fish passage obstruction. Linking over-diversions and other causes of inadequate flows with efforts to address fish barriers will

---

<sup>9</sup> See Water Resources Department, “Flow Restoration in Oregon,” [www.oregon.gov/owrd/pages/mgmt\\_instream.aspx](http://www.oregon.gov/owrd/pages/mgmt_instream.aspx).

<sup>10</sup> See Washington State Department of Ecology, “Instream Flows,” at: [www.ecy.wa.gov/programs/wr/instream-flows/isfhm.html](http://www.ecy.wa.gov/programs/wr/instream-flows/isfhm.html).

<sup>11</sup> *Id.*

<sup>12</sup> See Wild Salmon Center, “The Salmon Stronghold Initiative,” at: [www.wildsalmoncenter.org/programs/north\\_america/strongholds.php](http://www.wildsalmoncenter.org/programs/north_america/strongholds.php).

<sup>13</sup> See [http://www.wildsalmoncenter.org/programs/north\\_america/NASSP.php](http://www.wildsalmoncenter.org/programs/north_america/NASSP.php).

result in greater linkages between the Proposition 1-related efforts of the SCC and the SWRCB, CDFW, OPC and other agencies.

### **Wetland Restoration**

Much coastal habitat, including wetlands and subtidal habitat, has been degraded in California. For example, Southern California has lost over 95% of coastal wetlands to development. To address these challenges, ELC looks forward to the SCC's continued leadership in coastal wetland restoration. In order to maximize the effectiveness of future projects, ELC suggests the following change to the draft Strategic Plan Update.

*Enhance wetlands and subtidal habitats to restore ecosystem ~~function~~ health and provide multi-benefit flood protection, ~~and~~ resilient shorelines, and other ecosystem benefits.*

- Further highlight wetland restoration projects that are multibenefit in nature. Wetland restoration is benefitted from efforts to restore freshwater and sediment inputs (such as through dam removal), enhance groundwater recharge, and many other project types. The SCC should pursue multibenefit projects that achieve both wetland restoration and numerous other ecosystem benefits in collaboration with the CDFW, SWRCB, DWR, WCB, OPC and other agencies.

### **Urban Greening**

Finally, ELC recognizes urban greening projects as being important to the health of both nature and humans. ELC suggests the following revisions to the draft Strategic Plan Update to clarify and expand the scope of these efforts, consistent with an emphasis on integrated, multibenefit projects.

*Build **multibenefit** urban greening projects that increase groundwater recharge, reduce runoff, improve water quality and improve urban watershed health while creating public green-space and expanding urban forests. **Promote land conservation to protect existing green spaces and achieve other benefits, such as water supply.***

- Promote wetlands and/or other natural stormwater treatment systems. U.S. EPA has found that "wetlands are among the most effective stormwater practices in terms of pollutant removal..."<sup>14</sup> Other natural stormwater treatment systems, such as riparian/forested buffers, also offer multibenefit approaches to restoring urban watershed health. The benefits of such approaches should be highlighted in the draft Strategic Plan Update.
- Include acquisition or facilitation of coastal land and conservation easements as an identified priority, either alongside urban greening or separately, particularly where this would result in permanent instream flow dedications. Such permanent land protection helps achieve "multibenefit ecosystem and watershed protection and restoration projects" (Water Code Section 79731). Land and conservation easements resulting in permanent instream flow dedications should be prioritized in flow-impaired watersheds.

---

<sup>14</sup> Environmental Protection Agency, "Stormwater Wetland," at: <http://water.epa.gov/polwaste/npdes/swbmp/Stormwater-Wetland.cfm>.

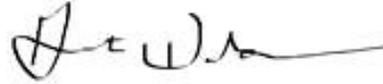
\* \* \*

Thank you for the opportunity to offer these comments on your timely Strategic Plan Update, to better ensure that the letter and spirit of Proposition 1, Safeguarding California and the California Water Action Plan are met.

Best regards,



Linda Sheehan  
Executive Director



Grant Wilson  
Outreach and Policy Coordinator

attachment



P.O. Box 3283 Fremont, CA 94539  
tel (510) 490-1690  
www.earthlawcenter.org

March 19, 2015

Samuel P. Schuchat, Executive Officer  
The Coastal Conservancy  
1330 Broadway #1300  
Oakland, CA 94612  
**VIA ELECTRONIC MAIL:** [comments@scc.ca.gov](mailto:comments@scc.ca.gov)

Re: Comments on Proposition 1 Grant Program Guidelines (Draft, Feb. 2015)

Dear Executive Officer Schuchat:

Earth Law Center (ELC) welcomes the opportunity to comment on the State Coastal Conservancy's (SCC) Draft Proposition 1 Grant Program Guidelines.<sup>1</sup> With the passage of Proposition 1<sup>2</sup> in November 2014, the state has a significant, new opportunity to ensure much-needed funding for multibenefit ecosystem and watershed protection and restoration projects. ELC is writing to urge the SCC to add to its draft Guidelines language specifically calling for greater inter-agency collaboration and activity in order to maximize the potential benefits of overlapping Proposition 1 funding and mandates. In particular, we request two things: first, that the following criterion be added to Section IV of the draft Grant Program Guidelines:

- The extent to which the project integrates in the related Proposition 1 funding resources and activities of other state agencies.

And second, we ask that as the proposal solicitation and review process commences, the SCC affirmatively reach out to other state agencies with related Proposition 1 funding sources and activities to establish, as appropriate, shared and/or jointly funded efforts (*e.g.*, through joint proposal solicitations) that "produce the greatest public benefit" from Proposition 1's limited funds. Support for these requests is provided below.

#### **PROPOSITION 1 EMPHASIZES COORDINATED, LEVERAGED AGENCY ACTION TOWARD IMPLEMENTATION OF MULTIBENEFIT PROJECTS**

Proposition 1 emphasizes the importance of both collaboration and leveraging of funds in ensuring successful implementation of multibenefit projects.<sup>3</sup> At the February 10<sup>th</sup> Assembly Water, Parks and Wildlife hearing on Proposition 1,<sup>4</sup> agency Secretaries and Department heads repeatedly noted

---

<sup>1</sup> <http://scc.ca.gov/files/2015/02/SCC-Prop-1-Guidelines-Draft-Feb-2015.pdf>.

<sup>2</sup> Water Quality, Supply, and Infrastructure Improvement Act of 2014, available at: [http://bondaccountability.resources.ca.gov/PDF/Prop1/PROPOSITION\\_1\\_text.pdf](http://bondaccountability.resources.ca.gov/PDF/Prop1/PROPOSITION_1_text.pdf).

<sup>3</sup> See, *e.g.*, Water Code §§ 79707, 79730-31.

<sup>4</sup> <http://awpw.assembly.ca.gov/currentsessionoversighthearings>; see also summaries at: <http://mavensnotebook.com/2015/02/24/proposition-1-oversight-hearing-part-1-background-on-the-water-bond-and-principles-for-moving-forward/>, <http://mavensnotebook.com/2015/02/25/prop-1-oversight-hearing-part-2-first-out-of->

the importance and value of leveraging different sources of funds through collaboration. For example, Secretary Laird highlighted that the California Water Action Plan is to be the framework for Proposition 1 bond expenditures and noted that the Plan describes “[c]ollaboration between federal, state, local and tribal governments” as “not only important,” but “essential” to success. (Emphasis added.) California Department of Fish and Wildlife (CDFW) Director Chuck Bonham added at the hearing that a critical element of the Water Action Plan is “integration,” noting that the Plan appropriately forces dialogue among CDFW and other agencies toward “greater gain through our integrated efforts across departments.”<sup>5</sup> This is consistent with Proposition 1’s statement of intent that funding be prioritized toward projects that “produce the greatest public benefit.”<sup>6</sup>

A related point emphasized in Proposition 1 and at the February 10<sup>th</sup> Water, Parks and Wildlife hearing is the need to support integrated, *multibenefit* projects. Proposition 1, Chapter 6 highlights multibenefit projects in both Water Code Sections 79730 (“multibenefit ecosystem and watershed protection and restoration projects”) and 79731 (“multibenefit water quality, water supply, and watershed protection and restoration projects for the watersheds of the state”). The California Water Action Plan similarly “[e]ncourage(s) state focus on projects with multiple benefits,” and adds that “the commitment to emphasize multiple benefit projects will be applied to most of the actions in this plan.” Former DWR Director Lester Snow further testified at the February 10<sup>th</sup> hearing that an effective integrated approach to Proposition 1 implementation would maximize spending impacts through integration of funding toward a shared goal.

A number of agencies have released draft Proposition 1 guidelines that relate closely to the type of watershed protection and restoration work supported within the SCC. For example, the Governor’s January budget allocates \$38.9 million to the Wildlife Conservation Board (WCB) for enhanced stream flow projects, and \$36.5 million to CDFW, \$30 million to the Ocean Protection Council (OPC), and \$83.5 million to the state Conservancies for watershed-related projects. In light of Proposition 1’s mandates for accountability and coordination, agencies should seek mutually beneficial partnerships that allow them to achieve the collaborative, leveraged, multibenefit results emphasized by the Governor and his administrative agency leadership.

The Natural Resources Agency must “verify that the guidelines are consistent with applicable statutes and for all the purposes enumerated in this division” – including the repeated emphasis on collaboratively leveraged funding toward multibenefit projects.<sup>7</sup> Clear processes for collaboration and integration of effort with other agencies would enhance the likelihood of approval by the Agency. As the first agency to release Proposition 1 draft guidelines, the SCC can set the tone for the others by adopting language that encourages such collaborative, multibenefit actions.

---

[the-gate-state-entities-with-proposed-water-bond-funding/](http://the-gate-state-entities-with-proposed-water-bond-funding/) and <http://mavensnotebook.com/2015/02/26/prop-1-oversight-hearing-part-3-looking-ahead-stakeholder-recommendations-for-maximizing-public-benefits/>.

<sup>5</sup> <http://mavensnotebook.com/2015/02/25/prop-1-oversight-hearing-part-2-first-out-of-the-gate-state-entities-with-proposed-water-bond-funding/> (emphasis added).

<sup>6</sup> Water Code § 79707(b).

<sup>7</sup> Water Code § 79708(d).

**The SCC Guidelines Can and Should Encourage Appropriate Inter-Agency Coordination and Leveraged Funding toward Implementation of Multibenefit Projects**

Chapter 6 of Proposition 1 allocates \$100.5 million to the Conservancy for competitive grants for multibenefit ecosystem and watershed protection and restoration projects.<sup>8</sup> The draft Proposition 1 funding guidelines state that all Proposition 1 grants funded by the SCC must achieve at least one of the Chapter 6 purposes articulated in Water Code Section 79732(a). The SCC’s proposed Proposition 1 funding guidelines include the following recommended scoring criteria (among others) relevant in some fashion to enhanced cooperation and collaboration among agencies:

- The extent to which the project achieves one or more of the purposes of Chapter 6.
- The extent to which the project promotes and implements the California Water Action Plan, other state and plans and policies, and relevant regional water plans.
- The extent to which the project leverages the resources of private, federal or local funding sources.
- The extent to which the project provides multiple benefits.
- The extent to which the project employs new or innovative technology or practices.
- The extent to which the project will deliver sustainable outcomes in the long-term.

This range of metrics specifically reflects the language of Proposition 1 and the California Water Action Plan calling for leveraged, multibenefit projects. However, it does not as directly reflect the call by agency and department heads at the February 10<sup>th</sup> hearing for integration and collaboration. We believe the end results of collaborative, inter-agency projects would be more substantial (*i.e.*, of greater public benefit) and longer lasting. More specific funding criteria relative to agency collaboration and associated inter-agency efforts would help promote such integrated efforts.

Accordingly, we ask the SCC to add the following criterion to Section IV (Grant Evaluation and Scoring) of the draft Grant Program Guidelines:

- The extent to which the project integrates in the related Proposition 1 funding resources and activities of other state agencies.

We also ask that, as the proposal solicitation and review process commences, that the SCC affirmatively reach out to agencies with related Proposition 1 funding sources and activities to establish, as appropriate, shared and/or jointly funded efforts that “produce the greatest public benefit” from Proposition 1’s limited funds (*e.g.*, through joint proposal solicitations). Examples include but are not limited to the OPC/Coastal Commission jointly funded Local Coastal Program grants application effort,<sup>9</sup> and the OPC/CDFW Joint Work Plan for the implementation of the Marine Life Protection Act and Marine Life Management Act.<sup>10</sup>

\* \* \*

---

<sup>8</sup> Water Code §79731(j).

<sup>9</sup> <http://www.opc.ca.gov/category/funding-opportunities/>.

<sup>10</sup> <http://www.opc.ca.gov/2010/08/opc-dfg-joint-work-plan/>.

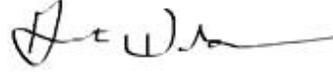
The SCC is in the unique and important position of being “first out of the gate” with its Proposition 1 draft guidelines. We urge the SCC to set the stage for the agencies to follow by incorporating the letter and spirit of Proposition 1 and the California Water Action Plan into its guidelines, through adoption of the recommended Guidelines criterion and related actions above.

Thank you for your consideration of these comments.

Best regards,



Linda Sheehan  
Executive Director



Grant Wilson  
Outreach and Program Coordinator

Appendix – Agency Draft Proposition 1 Funding Guidelines: Examples

## **APPENDIX**

### **AGENCY DRAFT PROPOSITION 1 FUNDING GUIDELINES: EXAMPLES**

#### **California Department of Fish and Wildlife Proposition 1 Funding Guidelines**<sup>11</sup>

In light of the significant focus at the Assembly Water, Parks and Wildlife Committee hearing on the need for projects to have multiple benefits, integrate agency activities, leverage funding and ensure consistency with the California Water Action Plan, there appears to be significant opportunity for SCC Proposition 1 funding to integrate with CDFW, particularly in the area of coastal habitat restoration. Accordingly, the SCC guidelines should encourage collaboration with CDFW on mutually beneficial and leveraged projects.

CDFW's draft Proposition 1 guidelines fund projects consistent with Fish and Game Code Section 1501.5(b), which allows CDFW to grant funds for fish and wildlife habitat preservation, restoration, and enhancement efforts that will preserve, protect, and restore fish and wildlife. Proposition 1 authorizes the Legislature to appropriate to \$285,000,000 to the CDFW for such "watershed restoration projects statewide."<sup>12</sup> As emphasized in the Assembly Water, Parks and Wildlife hearing, CDFW's Proposition 1 funding must implement the three broad objectives of the California Water Action Plan (more reliable water supplies; the restoration of important species and habitat; and a more resilient, sustainably managed water resources system), with a focus on restoring important species and habitat. As outlined in the draft guidelines, projects may include but are not limited to: "providing fish passage"; "restoring river channels"; "restoring or enhancing riparian, aquatic, and terrestrial habitat"; and "improving ecological functions." Each of these areas in which the SCC has or can provide expertise and assistance to ensure maximum utility and effectiveness of the funds and efforts committed.

CDFW intends to release project solicitations with additional, solicitation-specific criteria, and proposals will be ranked according to procedures outlined in those solicitations. The currently-proposed CDFW Proposition 1 funding guidelines state that the following (among other criteria) are "broadly representative of the types of criteria upon which proposals will be evaluated":

- "Extent to which the proposed project implements existing conservation, restoration, recovery plans, or other relevant State plans or policies."
- "Extent to which the proposed project employs new or innovative technology or practices."
- "Extent to which the proposed project provides multiple benefits; the objectives related to those co-benefits are clearly stated, and where feasible, are measurable and quantifiable; and likelihood that the claimed co-benefits will be realized."
- "Extent to which the proposal provides sufficient analysis and documentation to demonstrate the significance (e.g., magnitude, diversity) of the proposed objectives."
- "Extent to which the proposed project will deliver sustainable outcomes in the long-term."
- "Extent to which the proposal demonstrates the means by which data collected by the project will be managed and made publicly available."

---

<sup>11</sup> <http://bondaccountability.resources.ca.gov/Guidelines.aspx?PropositionPK=48>.

<sup>12</sup> Water Code § 79737.

**Wildlife Conservation Board Draft Proposition 1 Funding Guidelines**<sup>13</sup>

The WCB is a separate and independent Board with authority to carry out an acquisition and development program for wildlife conservation. The Board itself consists of the President of the Fish and Game Commission, the Director of CDFW, and the Director of the Department of Finance. The WCB is informed by a Legislative Advisory Committee consisting of three members of the Senate and three members of the Assembly.

Proposition 1 includes proposed funding for the WCB's California Stream Flow Enhancement Program, which will support implementation of multi-benefit ecosystem and watershed protection and restoration projects in accordance with statewide priorities.<sup>14</sup> Specifically, Water Code Section 79733 authorizes the Legislature to appropriate \$200,000,000 to the WCB for projects that result in enhanced stream flows, consistent with the California Water Action Plan's focus on ecosystem restoration. Examples of potentially eligible project types listed in the WCB's proposed Proposition 1 funding guidelines include:

- Water Transactions (e.g., changes to a stream's hydrograph through a lease, transfer, seasonal exchange)
- Habitat restoration projects
- Studies to evaluate instream flow needs, identify priority streams or evaluate temperature
- Reconnecting flood flows with restored flood plains

The WCB intends to release project solicitations with more specific criteria, and proposals will be ranked according to procedures outlined in those solicitations. Criteria will include "all of the following," among other criteria:

- "Clear demonstration of how the project will measurably enhance stream flows at a time and location necessary to provide fisheries or ecosystem benefits or improvements that improve upon existing flow conditions and are greater than required applicable environmental mitigation measures or compliance obligations"
- "Probability of success (e.g., does the proposal address site conditions, technologies, and projected future management to assure long-term success?)"
- "Habitat linkages"
- "Project significance (e.g., does the project provide long-term benefits to fish and wildlife, is it consistent with other conservation strategies?)"
- "Co-benefits (will the project provide multiple realistic and significant benefits that can be quantified and measured, and will deliver sustainable outcomes in the long-term?)"
- "How is the project location and anticipated outcome consistent with WCB's 2014 Strategic Plan, the California Water Action Plan, and other appropriate state and federal plans?"

As with CDFW, there again appears to be important opportunities for SCC Proposition 1 funding integration with the WCB, particularly in the area of coastal stream and other waterway flow restoration.

---

<sup>13</sup> <http://bondaccountability.resources.ca.gov/Guidelines.aspx?PropositionPK=48>.

<sup>14</sup> Water Code Section 79730.

## Exhibit 2: Public Comments on Draft Update

May 1, 2015

The Coastal Conservancy  
1330 Broadway #1300  
Oakland, CA 94612  
Submitted electronically to: [comments@scc.ca.gov](mailto:comments@scc.ca.gov)

RE: California State Coastal Conservancy Draft Strategic Plan Update

Dear Coastal Conservancy Staff and Commissioners:

For more than fifty years, Greenbelt Alliance has protected the Bay Area's natural and agricultural lands from sprawl development while helping our cities and towns grow in a way that creates great neighborhoods for everyone. As the champion of the places that make the Bay Area special, we ensure the right development happens in the right places and that development doesn't happen where it doesn't belong. With over ten thousand supporters, our staff and board work throughout the region to shape the rules that govern growth to protect our environment, enhance our economy, and advance social equity.

We appreciate this opportunity to comment on the State Coastal Conservancy draft strategic plan update.

The draft strategic plan update states that the Coastal Conservancy will seek to align its funding and project priorities with other state agencies. It also references specific regional programs that inform its investments, such as the Bay Area's Conservation Lands Network and Critical Linkages.

We encourage the Coastal Conservancy to amend the strategic plan update to highlight the San Francisco Bay Area's regional Priority Conservation Area (PCA) program and identify how the Coastal Conservancy will consider the PCA program in its investments.

The Association of Bay Area Governments (ABAG) established the PCA program to identify open spaces that:

1. Provide regionally significant agricultural, natural resource, scenic, recreational, and/or ecological values and ecosystem functions;
2. Are in urgent need of protection due to pressure from urban development or other factors; and
3. Are supported by local consensus.

The PCAs are envisioned as a framework for directing future funds for acquiring open space and conservation easements and the program has helped spur collaboration between local governments, public agencies, and nonprofit organizations.

The PCA program has informed the Bay Area's implementation of state climate policy, in particular our region's Sustainable Communities Strategy per SB 375 of 2008. The Metropolitan Transportation Commission, in coordination with ABAG, also created a first-in-the-nation grant program to direct transportation funds to

## Exhibit 2: Public Comments on Draft Update

support the PCAs. The Coastal Conservancy has been an integral partner in the PCA grant program, providing matching funds and administering a portion of the grant funds.

The Coastal Conservancy should identify the PCA Program in the strategic plan and consider providing additional priority to projects that are within one of the Bay Area's Priority Conservation Areas. By rewarding projects in these locations, the Coastal Conservancy would be reinforcing the collaborative efforts across our region to identify and protect important threatened lands. And by explicitly identifying the PCA program and similar regional programs in the guidelines, the Coastal Conservancy would increase these programs' visibility, potentially leading other entities to allocate more resources to support innovative regional programs.

Thank you for your consideration of these comments.

Sincerely,



Matt Vander Sluis  
Program Director  
Greenbelt Alliance  
[mvandersluis@greenbelt.org](mailto:mvandersluis@greenbelt.org)  
415-543-6771(x308)

## Exhibit 2: Public Comments on Draft Update

**From:** [JLucas1099@aol.com](mailto:JLucas1099@aol.com)  
**To:** [SCC Comments Email](#)  
**Subject:** 2015 Coastal Conservancy Strategic Plan Update  
**Date:** Saturday, May 02, 2015 9:46:24 AM

---

Sam Schuchat, Executive Director  
State Coastal Conservancy  
1330 Broadway, 13th Floor  
Oakland, CA 94612

May 2, 2015

Subject: Coastal Conservancy Strategic Plan Update - relative to Prop 1 funding

Dear Mr. Schuchat,

Rather belatedly would like to submit a candidate for coastal wetlands restoration, that fear no one is likely to be considering at this time, as the COE Shoreline Study in South Bay seems to be on its own trajectory.

Pond 18 was acquired by the City of San Jose decades ago to accommodate their water treatment plant's 260 mgd outflow to South Bay, through Artesian Slough, which regulatory had found to be adversely affecting South Bay wetlands with an inevitable conversion of salt marshes to brackish marsh.

At the time, it was my impression, also, that there was a need for storage of this outflow during extended storm events when bay levels were so high as to result in treatment plant outflow refluxing into low lying land surrounding plant. Plant employees evacuated by helicopter during one Coyote Creek/Bay tide reflux event.

The acreage of Pond 18 is sufficient to contain treatment plant outflow for a three to four day storm system and still allow San Jose's plant to process waste treatment for urban communities of the South Bay.

It could also support a brackish, freshwater marsh, similar to one Coastal Conservancy implemented in City of Palo Alto bay lands, that would flow at low tide into Bay in lower Coyote Creek or be contained behind tide gates in times of low barometric storm systems until Bay levels returned to normal.

Such a detention basin for treatment plant outflow would have benefit of making this extensive water resource available for reuse by South Bay industry or appropriate beneficial use in agriculture or landscape irrigation.

In hopes that the success of your Palo Alto Emily Renzel Marsh can be duplicated by creation of freshwater marsh in this vital Wildlife Refuge region of South San Francisco Bay, as well as be a pilot project to provide flood control and water reuse benefits with this substantial 260 mgd flow of California's diminishing resource.

Can expand on importance of disposition of Pond 18 in regards melding tidal action with Guadalupe /Coyote river flows but suggest recent Napa River flood project's creation of overflow marsh and wetlands as model.

Thank you for an opportunity to comment on Coastal Conservancy Strategic Plan Update and Prop 1.

Libby Lucas  
174 Yerba Santa Ave.,  
Los Altos, CA 94022

April 30, 2015

California Coastal Conservancy  
Attn: Mary Small, Deputy Executive Officer  
1330 Broadway #1300  
Oakland, CA 94612

Submitted via e-mail to: [comments@scc.ca.gov](mailto:comments@scc.ca.gov)

SUBJECT: Coastal Conservancy's Draft 2015 Strategic Plan Update

Dear Deputy Executive Officer Small:

The Midpeninsula Regional Open Space District (District) has reviewed the State Coastal Conservancy's (Conservancy) Draft 2015 Strategic Plan Update, which is an update to the 2012 Strategic Plan to include: funding priorities for Proposition 1 expenditure, updated Climate Change objectives and the newly created Santa Ana River Conservancy Program. The District is providing comments related to: (a) Conservancy's 13 purposes and four priorities for Proposition 1 grant funding, and (b) Conservancy's new goals and objectives in the Draft 2015 Strategic Plan Update.

In 2014, the District's Board of Directors approved the *Midpeninsula Regional Open Space District Open Space Vision Plan (Vision Plan)* containing 54 priority actions which would enable the District to achieve multiple purposes similar to those outlined in Chapter 6 of Proposition 1. The District's Vision Plan identifies land protection and stewardship priorities to:

- Protect bayfront habitat and restore critical wetlands to facilitate plants and animal migration as sea level rises;
- Conserve and restore key coastal watersheds and streams, including San Gregorio and Pescadero creeks, which provide habitat for threatened steelhead and endangered coho salmon;
- Preserve sensitive habitats, including old-growth redwood forests, coastal grasslands, and serpentine communities, as well as ponds, wetlands, and riparian areas, to promote persistence of the many rare plants and animals they support, including the marbled murrelet, San Francisco garter snake, and San Mateo woolly sunflower;
- Manage oak woodlands and conifer forests to restore their natural and species composition and enhance their resiliency to fire and diseases such as sudden oak death;

## Exhibit 2: Public Comments on Draft Update

- Promote habitat connectivity to facilitate movement of wildlife through “pinch points” within the Santa Cruz Mountains, including Highway 17, to enable migration to adjacent mountain ranges to maintain regional connectivity within the Central Coast; and;
- Facilitate adaptation and resiliency to global change, including a potentially hotter and drier climate, by conserving habitat and securing important landscape linkages that will enable species migration towards places that are within their climatic tolerances.

The District’s Vision Plan priority actions include water quality, water supply, watershed protection and restoration projects that would meet many of the purposes identified in Chapter 6 of Proposition 1 for protecting rivers, lakes, streams and coastal waters and watersheds.

Related to the Conservancy’s proposed funding priorities for implementing the Proposition 1 Grant Program Guidelines, the District had previously submitted comments on the draft guidelines on April 20, 2015 (see Attachment).

Related to the updated goals and objectives contained in the Draft 2015 Strategic Plan Update, the District is submitting more specific comments related to the new goals and objectives for the protection and enhancement of:

- Agricultural resources and Coastal and Bay Area working lands, and
- Natural habitats, watersheds and open space resources of regional importance

### **Agricultural Resources, Coastal and Bay Area Working Lands**

In June 2003, the District’s Board of Directors adopted a *Service Plan for the San Mateo Coastal Annexation Area (Service Plan)*, which recognizes that the agricultural and open space resources along approximately 40 miles of the San Mateo County coast are of national significance and deserving of the highest level of stewardship possible. The District’s *Coastside Protection Program* was implemented in November 2004 when the District’s boundary was amended to include coastal lands identified in the *Service Plan*. Further, the District Board believes that the continuation of active agricultural and ranching uses on the San Mateo County coast is very important in retaining the area’s rural atmosphere and way of life and has actively pursued projects that will implement the goals of the *Coastside Protection Program*.

The Conservancy’s Strategic Plan goals and objectives also recognize the importance of coastal agriculture supporting the region’s economy. The Conservancy’s updated Goals #4, #6 and #13 promote long-term viability of working lands and partnerships between public agencies working with private farmers, ranchers and timber producers. The District’s *Service Plan* is consistent with the Conservancy’s Strategic Plan goals and objectives.

However, the District proposes that there should be greater acknowledgment of the cooperative working relationships between public/non-profit agencies with private landowners and the technical assistance provided by local Resource Conservation Districts (RCDs) and Natural Resources Conservation Services (NRCS) in implementing resource management projects with the private farming, ranching and timber producing community.

For example, Objective #13B should be revised to acknowledge and promote these viable, working partnerships:

Exhibit 2: Public Comments on Draft Update

Objective 13B: In cooperation with local Resource Conservation Districts (RCDs) and Natural Resources Conservation Services (NRCS), public agencies, land trusts, and private landowners, implement projects that assist farmers and ranchers to steward the natural resources on their lands.

**Natural habitats, watersheds and open space resources of regional importance**

There is synergy and interdependencies between the Conservancy’s new goals/objectives, purposes of Proposition 1, and the Association of Bay Area Government (ABAG)’s Priority Conservation Area (PCA) Program goals. PCAs are designated to recognize and highlight regional open space areas that provide multiple benefits such as: (a) terrestrial (land) ecosystems, (b) aquatic (water) ecosystems, (c) water supply and water quality, (d) agricultural resources and economy, (e) community health, (f) recreation, (g) climate and resilience, and (h) compact growth when being considered for long-term conservation funding.

The Conservancy’s Strategic Plan Update goals should relate more closely with ABAG’s PCA designations for implementation of the Strategic Plan and future funding priorities. The Conservancy’s goals would achieve similar multiple benefits as intended with the PCA program. In addition, this interdependence between the Conservancy and ABAG had been established when both agencies, along with the Metropolitan Transportation Commission (MTC), partnered on the administration of the One Bay Area Grant (OBAG) Program in 2013, where future funding programs, such as Proposition 1 and other funding sources, would likely rely on and benefit from these interdependencies.

The updated Strategic Plan goals and objectives should be charted with the objectives of the Association of Bay Area Government’s Priority Conservation Area (PCA) Program which recognizes: Natural Lands, Regional Recreation, Agricultural Lands and Urban Greening for priority conservation areas. This interdependency can be highlighted in the Conservancy’s *Draft Appendix 2 - Matrix of Plans and Priorities* with an added column for the ABAG PCA Program goals and benefits. Evaluating projects that would meet the Conservancy’s Strategic Plan Update and ABAG’s PCA Designations would promote coordinated and cross-referenced program goals for achieving similar benefits to water quality, water supply, watershed protection and ecosystem restorations.

<b>Coastal Conservancy’s Draft Strategic Plan Update</b>	<b>ABAG’s Priority Conservation Area Program</b>
Goal #4: Protect significant coastal resource properties, including cropland, rangeland and forests.	PCAs designate farmland, grazing land and timberland that support the region's agricultural economy and provide additional benefits such as habitat protection and carbon capture (Agricultural Lands PCA).
Goal #5: Enhance biological diversity; improve water quality, habitat and other natural resources within coastal watersheds.	PCAs designate areas critical to the functioning of wildlife and plant habitats, aquatic ecosystems and the region's water supply and quality (Natural Landscapes PCA).
Goal #6: Enhance coastal working lands, including cropland, rangeland and forests.	See narrative for Agricultural Lands PCA.

Exhibit 2: Public Comments on Draft Update

Goal #7: Enhance the resiliency of all coastal and San Francisco Bay Area Communities and ecosystems to the impacts of climate change and implement greenhouse gas reduction projects.	PCA designations are intended to demonstrate benefits such as climate and resilience: <ul style="list-style-type: none"><li>• PCAs that are designated as an Urban Greening PCA would have to demonstrate how it supports Local Climate Action Plan/Greening Plan Goals related to Urban Greening.</li><li>• PCAs that are designated as Natural Landscapes PCA and/or Urban Greening PCA would have to demonstrate protection of and/or increasing areas with carbon storage potential.</li></ul>
Goal #11: Protect and enhance natural habitats and connecting corridors, watersheds, scenic areas, and other open space resources of regional importance in the Bay Area.	See narrative for Natural Landscapes PCA.
Goal #13: Protect Bay Area working lands and support farmers and ranchers in implementing stewardship of the natural resources on their lands.	See narrative for Agricultural Lands PCA.

Thank you for the opportunity to review and comment on the Draft 2015 Coastal Conservancy Strategic Plan Update. Please do not hesitate to e-mail me at [jmark@openspace.org](mailto:jmark@openspace.org) or call me at (650) 691-1200 if you have questions.

Sincerely yours,



Jane Mark, AICP  
Planning Manager

CC: Liz Westbrook, Peninsula Open Space Trust  
Miriam Chion, Association of Bay Area Government  
JoAnna Bullock, Association of Bay Area Government  
Steve Abbors, Midpeninsula Regional Open Space District  
Ana Ruiz, Midpeninsula Regional Open Space District

Attachment: April 20, 2015 Comment letter for Draft Proposition 1 Grant Program Guidelines

## Exhibit 2: Public Comments on Draft Update

March 20, 2015

California State Coastal Conservancy  
1330 Broadway #1300  
Oakland, CA 94612

SUBJECT: Proposition 1 Grant Program Guidelines (Draft February 2015) for  
Grants Funded by the 2014 Water Quality, Supply and Infrastructure Improvement Act

Dear Coastal Conservancy:

The Midpeninsula Regional Open Space District (District) appreciates the opportunity to review the Coastal Conservancy's (Conservancy's) draft guidelines for the Proposition 1 Grant Program and submits the following comments.

The District has been fortunate to be a grantee of Conservancy administered grants and has appreciated the efficiency and expediency of the Conservancy's process in granting and administering these funds. We truly hope that additional future grant requirements and process elements will remain streamlined to avoid negatively impacting funding opportunities and delaying or precluding an agency's ability to implement new projects that benefit the public.

Related to the regional planning work that the Association of Bay Area Governments (ABAG) is implementing with Plan Bay Area and Priority Conservation Areas (PCA), the District recommends that the Conservancy consider the use of PCA designations as one of the project selection criteria, in one or more of the following ways:

- For the criterion addressing "whether the project is consistent with best available science," PCAs are based on best available science for long-term conservation planning and can be weighted with 3-4 points out of this 8-point criterion.
- Assign additional bonus points for projects that are located within a PCA designation approved by ABAG.
- Include the PCA program as a regional planning program that is similar to the objectives related to Chapter 6 of Proposition 1. The Conservancy's update of the Strategic Plan should include the objectives of the PCA program which Proposition 1 funded projects would also be able to achieve.

Please find below specific comments related to various sections of the Program guidelines.

### **B. Conservancy Required Project Selection Criteria**

For the eight (8) Project Selection Criteria included in Appendix C, the Conservancy should acknowledge that not all worthy projects would be located within areas vulnerable to future sea level rise, such that

## Exhibit 2: Public Comments on Draft Update

this criterion may or may not apply to all projects and should be qualified as such. Would a project have to meet ALL eight of these criteria to be eligible for the grant funding? We strongly urge that projects not be required to meet this criterion to be considered eligible for funding as this criterion would eliminate many beneficial projects that meet the intent and goals of Proposition 1, and would thus potentially eliminate or delay many beneficial public projects from being completed to improve the quality of life for current and future Californians.

### **F. Project Eligibility**

On page 5, under the second paragraph, the guidelines state, “all projects funded by Proposition 1 must be consistent with the Porter-Cologne Water Quality Control Act and the State’s five-year infrastructure plan prepared pursuant to Government Code section 13100.” What year is the State’s five-year infrastructure plan and how frequently is this infrastructure updated? How can local projects be added to this infrastructure plan? It appears that this requirement may be overly burdensome for local public agencies and small organizations, particularly those with limited staff and funding. This requirement may result in the disparate distribution of funding, where only those agencies and organizations that possess the resources to complete these additional requirements will be able to benefit from the grant program.

### **III. Grant Application Process and Timeline**

#### **B. Project Solicitation Periods**

The November 1 – December 31 project solicitation period is shortened by at least two business days, as this transpires over two holidays. Moreover, this is a time period when many people tend to take long, extended vacations and leaves due to the holidays, religious affiliations, and school scheduled. We strongly urge this period to be extended to mid-January for this reason to ensure sufficient time.

#### **C. Application Review and Evaluation**

1. When and how would the Conservancy notify a grantee that the grantee’s application is incomplete and needs additional work to complete and resubmit? How much time would be allowed for re-submittals? Under Screening, the guidelines state, “The Conservancy has discretion to either return the application or assist the applicant with gathering additional information and modifying the proposal to enable the application to pass the screening process.” How would the Conservancy notify the grantee that the Conservancy has decided to gather additional info and modify the proposal or not?
2. If there is a discrepancy in scoring by the three initial reviewers, will there be a set number of reviewers added? An average can be affected by a higher number of reviewers.

#### **D. Grant Award**

Please allow additional time for the Grantee Agency’s elected officials (boards, councils, etc.) to adopt a resolution accepting the grant funds as part of the agency’s revenues. The scheduling of new Agenda Items onto board and council Agendas can require multiple months to allow sufficient time for report production, review, and finalization for inclusion in a future Board/Council Agenda packet.

#### **E. Board Meetings**

Would the Grantee be required to attend the Conservancy Board meeting during which the Conservancy Board would approve the grant? If the meeting is being held a significant distance away, is it possible to attend the meeting via videoconference or teleconference to save travel time and associated costs.

#### **IV. Grant Evaluation and Scoring**

##### **B. Evaluation Scoring Criteria**

For the excerpted criterion below, what percentage of the local matching funds could include in-kind labor (e.g. Construction Crew, Project Management time, CCC hours) in lieu of or in addition to matching monetary funds?

For the excerpted criterion below, how would this method or metric for measuring/reporting project effectiveness be evaluated consistently for all the project applications since each project is different and can be measured differently?

*“The extent to which the applicant demonstrates a clear and reasonable method for measuring and reporting the effectiveness of the project.”*

For the excerpted criterion below, how would this criterion be measured when there is continually new technology that is made available? Can this criterion include innovative use or development of new geographic data and analysis?

*“The extent to which the project employs new or innovative technology or practices.”*

For the excerpted criterion below, would the application require an Operations and Management (O&M) Plan and funds to demonstrate long-term sustainability? Or would the project need to demonstrate how similar projects have proven their long-term viability? It may be difficult to demonstrate the effectiveness of long-term outcomes, if the project were the first of its kind and pioneering new outcomes. Also, we urge against requiring an O&M Plan and set aside O&M funds, as these become additional burdens for project applicants. Moreover, it would also become overly burdensome for the grantor to review, monitor, and enforce such requirements. Furthermore, the required Resolution from the board/council should be sufficient to explicitly state the grantee’s commitment to maintain and operate the grant-funded project in the long-term.

*“The extent to which the project will deliver sustainable outcomes in the long-term.”*

##### **BONUS POINTS**

The guidelines state, “Projects that have >100% matching funds from private, federal, or local funding sources will receive 5 bonus points.” Please clarify that non-profit funding from foundations and etc., would be included as a matching fund, and that in-kind labor (e.g. construction crew time, project management time, etc.) would be allowed as a local funding source. Please also clarify that for multi-phased projects, initial planning and design funding can also qualify as matching funds for projects that are seeking construction grant support.

It also states that “Projects that use the California Conservation Corps for project implementation will receive 5 points.” If other local Conservation Corps were used, such as San Jose Conservation Corps or American Conservation Experience, would there be additional bonus points assigned as well, even if the San Jose Conservation Corps may not be state-funded?

#### **V. Additional Information**

1. What is the maximum and minimum requested amount for a grant application?
2. Is there a limit to the number of applications that can submitted by an agency at any one time?

### **C. Grant Provisions**

Regarding these provisions, the guidelines state that, “the grant agreement must be signed by the grantee before funds will be disbursed.” Since the grant reimbursement is paid in arrears, then the grantee agency must have funds to cover the initial implementation costs and submit for reimbursement. Recognizing that many agencies will seek grant funds because of insufficient capital funding to otherwise implement new project, we urge that the grant agreement be signed before funds are *incurred*, rather than disbursed.

### **D. Environmental Documents**

Would the Coastal Conservancy need to be cited as a Responsible Agency under CEQA for the environmental documents, since there will be state funding used for project implementation? Would the grant application require a Notice of Exemption (NOE) or Notice of Completion (NOC) associated with the project’s environmental compliance as part of the reimbursement submittals? Would the application require a Resolution of findings related to the adoption/certification of the environmental documents (e.g. Initial Study/Mitigated Negative Declaration and Environmental Impact Report)? When would these notices or resolutions need to be provided? Would the notices be required at the time of application, within a certain time of award of the grant funding, or at the time of grant reimbursement submittals?

### **E. Project Monitoring and Reporting**

The guidelines state, “*The grant application evaluation will assess the robustness of the proposed monitoring program.*” How would “robustness” be assessed for varying types of projects? Would there be a range of measures to evaluate a project for robustness? How frequent would reports need to be submitted? Please note that the more frequent and extended these requirements are, the greater the burden placed both on both the grantees and Coastal Conservancy staff who will need to review the information.

### **F. Leveraging Funds**

In order to demonstrate need, the project would need to show that there is insufficient funding for project implementation thereby needing this grant funding. For the matching funds, we urge the Conservancy to allow in-kind labor (e.g. construction crew time, project management time, volunteer hours, etc.) as well as early project funding (initial planning, design, CEQA compliance) as part of the matching funds. These are true, substantial, and necessary costs that an agency will bear to complete new projects and therefore demonstrate a real commitment to pursue and complete these projects.

Thank you for your consideration of these comments on the Draft Program Guidelines. If you have additional questions, please do not hesitate in contacting me at [Jmark@openspace.org](mailto:Jmark@openspace.org) or at (650) 691-1200.

Sincerely,



Jane Mark, AICP  
Planning Manager

CC: Ana Ruiz, AICP, Assistant General Manager  
Tina Hugg, Senior Planner

## Exhibit 2: Public Comments on Draft Update

Sam Schuchat, Executive Director  
State Coastal Conservancy  
1330 Broadway, Suite 1300  
Oakland, CA 94612

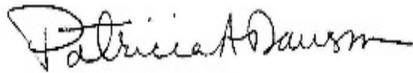
Dear Sam,

On behalf of the *Santa Ana River Trail and Parkway Partnership*, I want to thank you for the opportunity to submit comments on the Coastal Conservancy's 2015 Strategic Plan Update dated 03/12/15. We are thrilled to be part of the Coastal Conservancy now with creation of the Santa Ana River Conservancy program!

The 2015 Strategic Plan Update ("Update") provides good connections to the adopted 2013 – 2018 strategic plan and the legislative direction required by Proposition 1 funds.

The Santa Ana River Conservancy Program promises to bring much needed resources and attention to the largest watershed in Southern California. As you know, inland Southern California has arguably lacked parity with other parts of the state regarding funding of critical environmental programs. The Partnership was happy to help support the Santa Ana River Conservancy Program creation and continues to be a willing and active advocate for the Coastal Conservancy's needs. As Henry Ford so eloquently stated: ***Coming together is a beginning; keeping together is progress; working together is success.*** We are happy to have expanded the 3-county Partnership to include and support the Coastal Conservancy.

Thanks again for the opportunity to comment. Again, looking forward to working with you.



Patricia Lock Dawson

Principal Consultant, Santa Ana River Trail and Parkway Partnership



California Chapter  
201 Mission Street, Fourth Floor  
San Francisco, CA 94105

Tel [415] 777-0487  
Fax [415] 777-0244  
nature.org

April 30, 2015

State Coastal Conservancy  
1330 Broadway, 13th Floor  
Oakland, CA 94612

Re: Comments on Draft 2015 Coastal Conservancy Strategic Plan Update

To Whom It May Concern:

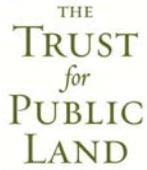
Thank you for the opportunity to comment on the Draft 2015 Coastal Conservancy Strategic Plan Update (Update). As a sponsor of SB 1066 (Lieu), which ensured that the State Coastal Conservancy (Conservancy) had the authority to engage in projects that address climate change, The Nature Conservancy (TNC) is very pleased to see the Conservancy reiterate its commitment to coastal climate adaptation in this Update. In general, we think the Update is well-founded, establishes reasonable priorities, and sets ambitious – yet achievable – numeric objectives.

We remain concerned, however, that the Conservancy should do more to articulate how it will contribute to the significant advance planning that local governments need in order to make successful capital investments in adaptation. We are concerned that the limits on the use of Proposition 1 bond funding for planning purposes will encourage the development of capital projects in advance of adequate planning, resulting in unintended adverse consequences. Given the explicit priority this Update gives to climate change adaptation, the Conservancy should seize this opportunity to articulate a creative approach to ensuring that capital outlays for adaptation are supported by robust (and well-funded) planning. The Conservancy should consider pairing bond funds with the remaining Prop. 84 funds to both plan and execute sea level rise adaptation projects. At a minimum, the Conservancy should award higher points for entities providing matching funds that will be used for planning or to proposals that can demonstrate that adequate vulnerability planning has been conducted for the proposed project area.

Once again, TNC thanks you for the opportunity to comment on the draft Update. In particular, thank you for your commitment and leadership on the critical issue of coastal climate change adaptation. Please feel free to contact me if you have any questions.

Sincerely,

Sarah Newkirk  
Coastal Project Director



California Office  
101 Montgomery St.  
Suite 1100  
San Francisco, CA  
94104  
T. (415) 495-4014  
F. (415) 495-0540  
www.tpl.org

VIA EMAIL

April 30, 2015

Mr. Sam Schuchat  
Executive Officer  
State Coastal Conservancy  
1330 Broadway, 13<sup>th</sup> Floor  
Oakland, CA 94612-2530

**Re: 2015 Coastal Conservancy Strategic Plan Update**

Dear Sam:

Thank you for the opportunity to comment on the State Coastal Conservancy (Conservancy) Strategic Plan Update (Update) to include funding priorities for Proposition 1 expenditure, to update the Climate Change objectives and to include the newly created Santa Ana River Conservancy. We sincerely appreciate the comprehensiveness of the document and support the holistic approach to developing Proposition 1 expenditure priorities consistent with relevant state plans and priorities. Specifically, we support the plan's focus on climate change adaptation and greenhouse gas reduction as well as the prioritization of urban greening for Proposition 1 funding and believe that this shift is exactly what is needed in California. We have reviewed the draft update and have summarized our (minor) comments below.

**Coastal Conservancy proposition 1 Priorities**

**Anadromous Fish:** The other priorities have action words associated with them (i.e. wetland *restoration*). We suggest "Protect Anadromous Fish."

**Urban Greening:** The Trust for Public Land works throughout California to create and improve urban parks and green spaces for communities. We work in some of the state's most densely populated, park poor neighborhoods to transform worn-out local sites into vital community resources that promote neighborhood health and sustainability and provide a myriad of environmental and climate change resiliency benefits. We are pleased to see the description of the urban greening priority on p.4. The description is comprehensive and the definition of urban greening is thoughtful and complete.

Thank you again for the opportunity to comment on the Conservancy's Strategic Plan Update. Please let me know if you have any questions or require further information. I can be reached at 415.800.5309 or via e-mail at [Mary.Creasman@tpl.org](mailto:Mary.Creasman@tpl.org).

Sincerely,

A handwritten signature in black ink that reads "Mary Creasman".

Mary Creasman  
California Director of Government Affairs