



October 3, 2022

Ms. Amy Hutzel, Executive Officer  
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Oakland, CA 94612-1401

via email to [StrategicPlan@scc.ca.gov](mailto:StrategicPlan@scc.ca.gov)

Dear Ms. Hutzel:

Thank you for the opportunity to comment on the Coastal Conservancy's draft [Strategic Plan](#) for 2023-2027. We commend Conservancy staff on the significant outreach that went into the Plan's development and for the inclusive opportunities to provide input on the draft. We are providing comments here on behalf of Audubon California, Coastal Policy Solutions, and The Pew Charitable Trusts; our organizations work to protect and conserve California's coastal habitats for biodiversity and ecosystem health.

We support the current approach of the draft Strategic Plan and encourage a strong, accountable final Plan that helps ensure California can achieve its existing state policy of no net loss of wetlands – including tidal marshes and eelgrass. Meeting this vital goal will entail tracking and understanding the status of wetlands across the coast while also providing a pathway for these habitats to survive in the face of climate change.

We are pleased to see the Plan's overarching focus on addressing inequity, the climate crisis, and funding reflected throughout the Plan's Goals and Objectives, and agree that the work of the Conservancy must center these issues to ensure they are considered holistically. Additionally, we appreciate the Key Strategy to "Implement Existing State and Regional Plans." Agencies across our state have spent considerable time and resources planning for the future of the California coast and the full implementation of those plans would significantly advance the priorities identified in the Conservancy's Strategic Plan.

We are also encouraged to see the following included in the draft Plan:

- Page 11: Revisiting indirect cost policy and expanding Conservancy ability to advance funds rather than relying solely on reimbursement for grantees.

- Page 11: Funding for early planning and pilot projects.
- Page 20: Specificity regarding the kinds of activities the Conservancy will support to expand accessibility.
- Page 26: Supporting managed retreat and projects that allow space for upland and inland migration of coastal habitats.

Below, we have outlined suggestions for how the draft Plan may be further strengthened; these include some priority high-level comments, followed by more specific line-item comments that go through the Plan section by section.

### **High-level comments:**

1. We believe the Plan would benefit from greater specificity throughout the Goals and Objectives. As a roadmap for the next five years, we suggest that more detail would better clarify how the Conservancy will work to achieve its goals. This will also help to identify tangible ways that partners can support the Conservancy in reaching these goals.
2. The final plan should ensure that all Conservancy-supported projects are comprehensively and consistently mapped and tracked to fully understand and measure progress toward statewide restoration and protection targets as well as no-net-loss goals and policies.
3. The acquisition of future habitat should be elevated as a key objective to help wetlands migrate inland in the face of sea level rise.
4. Carbon sequestration, in coastal “blue carbon” and other habitats, should be included as an additional co-benefit where appropriate for multi-benefit nature-based climate adaptation projects.
5. The final Plan should commit to identifying and/or seeking sources of long-term funding to support Tribal co-management activities and expand Tribal capacity to steward coastal resources, including opportunities for both federally and non-federally recognized tribes.

### **Specific comments section by section (bolded comments are higher priority):**

- “Key Strategies: Implement Existing State and Regional Plans” (page 9)
  - Where relevant/possible, please include examples of Central Coast and North Coast regional conservation plans.
  - In addition to the *Pathways to 30x30 Strategy* and the *State Agency Sea Level Rise Action Plan*, we suggest also incorporating reference to implementation of the *California Ocean Protection Council’s 2020-2025 Strategic Plan*.
- “Key Strategies: Accelerate Action” (page 9)
  - How does the Conservancy plan to prioritize regionally significant projects? For transparency, we recommend that prioritization processes be described here.

- “Key Strategies: Build Capacity and Invest in Meaningful Engagement” (page 10)
  - **Ensure that updated tribal engagement policies include non-federally recognized tribes.**
- “How We Work: Support Planning and Project Monitoring” (page 11)
  - **We recommend removing the language “Where funding allows” when discussing Conservancy commitment to supporting project monitoring.** As highlighted above, Conservancy projects should be comprehensively monitored and tracked using consistent methods in order to measure progress towards statewide habitat goals. To ensure this monitoring happens, we suggest that the Conservancy commit to funding such monitoring as a key part of project implementation, particularly given that it is often required as a condition of permitting.
- “Goal 1: Prioritize Equity” (page 14)
  - We recommend numbering the listed objectives under each of the Plan’s goals to make items easier to reference now and in the future.
  - We suggest clarifying the distinction between Objective 1 (“Commit funding to benefit systemically excluded communities”) and Objective 2 (“Support systemically excluded communities”).
- “Goal 1: Prioritize Equity - Commit Funding to Benefit to Systemically Excluded Communities” (page 14)
  - Consider adding language explaining how the 40% funding goal was established. Will this 40% apply to all Conservancy funds or to specific programs? Will there be broad geographical diversity reflected in this funding?
- “Goal 1: Prioritize Equity - Return Power to Tribes” (page 15)
  - **We recommend including more specificity about how the Conservancy will work to return control of ancestral lands to tribes.** Would this primarily entail funding projects that come to the Conservancy via grant applications? Or are there other actions the Conservancy plans to take to support this objective?
- “Goal 1: Prioritize Equity - Support Systemically Excluded Communities” (page 15)
  - Similar to the above bullet, how does the Conservancy plan to build capacity of community-based organizations in these communities?
  - We note that this support can move in both directions. The Conservancy may also benefit from seeking expert advice from community-based organizations to expand the way the Conservancy approaches its work.
- “Goal 1: Prioritize Equity - Incorporate Workforce Development in Our Projects” (page 16)
  - Many project applicants are experts in their project’s activities (e.g., restoring wetlands), but may need additional support/guidance to meaningfully include workforce development in their proposed projects. Consider prioritizing collaborating with grantees to identify how best to include workforce

development objectives in their projects, including engaging with grantees to ensure their ability to implement projects as equitably as possible.

- “Goal 2: Enjoy the Coast” (page 18)
  - There are two more objectives listed in this section than are included in the section’s introductory text (e.g., “Coastal Stories Program” and “Expand Accessibility” are described in the text but not listed in the introduction). We suggest aligning the objectives with the associated text.
  - **The Plan states, “Increase access points and trails within existing natural areas.” The language should clarify that access will also be balanced with the protection of sensitive habitat in these natural areas.**
- “Goal 2: Enjoy the Coast - Explore the Coast Program Grants” (page 19)
  - For this and other metric targets, more specificity where available would benefit Plan implementation. In this case, has the Conservancy identified the target geographic distribution of these 100 projects?
- “Goal 2: Expand the Coast - Expand Accessibility” (page 20)
  - We recommend that multilingual signage be prioritized.
- “Goal 2: Enjoy the Coast - Recreation Facilities and Amenities” (pages 20-21)
  - While parking will continue to be a priority for equitable coastal access, **the Conservancy should seek ways to support an increase in reliable public transportation and safe multimodal options to reach the coast.**
  - Consider including language here that emphasizes opportunities to [reduce the impact of parking lots](#) by prioritizing installation of permeable surfaces and other best management practices (e.g., bioswales, vegetated buffers, reducing hardscape, etc.).
  - **Any new facilities supported by the Conservancy should be resilient to sea level rise and should incorporate green building practices** (e.g., living roofs, water recycling, rooftop solar, etc.). Sea level rise solutions should also address the potential for managed retreat and building plans must not inhibit the upland migration of coastal habitats.
- “Goal 2: Enjoy the Coast - Piers and Waterfronts” (page 21)
  - **We recommend that this section include discussion of derelict pier removal**, including the importance of removing creosote-treated pilings and ensuring that removal projects **avoid impacts to submerged aquatic vegetation.**
  - Regarding the metrics and targets for this objective, consider amending these measures to reflect a prioritization for nature-based solutions.
- “Goal 2: Enjoy the Coast - Explore the Coast Overnight” (page 21)
  - We recommend updating the language here and elsewhere to ensure that all built projects demonstrate sea level rise resiliency and how the needs of coastal habitats (e.g., buffers, upslope migration) have been incorporated into site/building design.
- “Goal 3: Protect and Restore the Coast (page 23)

- Please include a numbered list of the objectives for this goal.
- The Plan references the challenge of ongoing habitat management. We recommend that **the Conservancy plan to make funds available to support these types of long-term activities where possible.**
- “Goal 3: Protect and Restore the Coast - Conserve Land” (page 23)
  - We suggest including more detail about how land conservation projects will be prioritized. We also recommend identifying opportunities where the Conservancy could partner with other agencies (such as OPC) to prioritize funding for science that enables identification of land needed for marsh migration, particularly with respect to data needs around estuarine hydrology and other information gaps.
  - Regarding the metric and target, please further define “conserved” and whether the Conservancy will be prioritizing conservation easements, public ownership, etc.
- “Goal 3: Protect and Restore the Coast - Restore or Enhance Habitats” (pages 23-24)
  - **We suggest that the detail in this section be expanded to specifically prioritize eelgrass and other submerged aquatic vegetation, as well as salt marsh, transition marsh, and upland habitats.**
  - Regarding the first bullet, “Identify and prioritize restoration projects...”: How will this prioritization occur? We recommend updating the language to require the use of the EcoAtlas Project Tracker for all Conservancy-funded projects.
  - Regarding metrics and targets for this section: **The metrics should be refined to reflect targets for various habitat types (especially in terms of acres restored) and geographic distribution of projects.** The target acreages should also be consistent with other state and regional plans to the greatest extent possible (e.g., Ocean Protection Council Strategic Plan, San Francisco Estuary Blueprint, etc.)
- “Goal 3: Protect and Restore the Coast - Cut Green Tape” (page 25)
  - **We recommend including greater specificity about the types of projects that would meet this goal, as well as additional detail regarding opportunities to streamline and accelerate permitting processes in a manner that also ensures full compliance with environmental safeguards.**
- “Goal 4: Climate Ready” (page 26)
  - Please include a numbered list of the objectives for this goal.
  - While more pilot projects are important, consider clarifying this language to elevate the implementation of large-scale adaptation projects based on lessons learned from existing pilot projects.
- “Goal 4: Climate Ready - SLR Adaptation Projects” (page 26)
  - Regarding the metrics and targets for this objective: we recommend including a description of how these projects will be defined. For example, if a project aims to restore salt marsh as part of a multi-benefit project for wildlife habitat and

shoreline protection, would that count toward the targets for projects that restore habitats or toward SLR adaptation projects?

- “Goal 4: Climate Ready - Wildfire Resilience Projects” (page 27)
  - Please **update this language to prioritize the incorporation of traditional ecological knowledge in wildfire resilience efforts.**
  - Consider conducting further outreach to Tribal communities to identify additional specific actions for this objective and ensure appropriate compensation is provided.
- “Goal 4: Climate Ready - Multi-Benefit Nature-Based Climate Adaptation” (page 27)
  - We suggest updating this language to include carbon sequestration as one of the benefits for projects supported under this objective.
- “Goal 5: Organizational Goals” (page 28)
  - Consider updating the metrics to be more quantitative and include targets.
  - Ensuring competitive staff salaries will be key to improving retention, as well as increasing the diversity of applicants who can make a career at the Conservancy.

Thank you again for the opportunity to provide input on the Conservancy’s draft Strategic Plan. We very much appreciate the thoughtful attention that went into developing this forward-looking draft and we look forward to seeing how the final Plan unfolds. If you would like to discuss any of our suggestions, please don’t hesitate to contact us.

Sincerely,



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