CPEHN
California Pan-Ethnic Health Network

Attention: Natural Resources Agency
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Sacramento, CA 95814
Via Email: climate@resources.ca.gov

To whom it may concern:

On behalf of the California Pan-Ethnic Health Network, I would like to thank you for the opportunity to comment on the recent revised version of *Safeguarding California 2017*. Our changing climate is the public health crisis of our time. While climate change is far-reaching and will impact everyone, low-income communities and people of color disproportionately suffer from the impacts of climate change and in greater ways than other communities.

About CPEHN
CPEHN is a multicultural health advocacy organization dedicated to improving the health of communities of color in California. CPEHN's mission is to eliminate health disparities by advocating for public policies and sufficient resources to address the health needs of our communities.

California has long been a diverse state. By 2050, communities of color are expected to be 75% of California's population.[i] Currently, Latinos are 38% of the population and by 2025 they are expected to reach 42%.[ii] Our state is also home to the largest Asian American and fifth largest African American populations in the nation.[iii] Approximately 4 in 10 Californians are living in or near poverty.[iv] More than 40% of Californians speak a language other than English at home, and an estimated six to seven million Californians (or one in five) are Limited English Proficient meaning they speak English less than "very well."[v] In addition, the number of adults age 65 and older is projected to grow from 4.8 million to over 7 million by 2025.[vi] The areas of the state expected to grow the fastest include the Inland Empire, the Sacramento region, and the San Joaquin Valley.[vii]

Any vision for improving the resilience of communities in the face of climate change must explicitly acknowledge these population shifts and account for the specific needs of California's low-income and communities of color.

Impacts of Climate Change on Vulnerable Communities
Generations of economic disinvestment, unjust land use practices, and inequitable transportation planning have made vulnerable communities far less equipped to handle the most serious repercussions of climate change. For instance, as climate change drives up the cost of electricity, water, and food, low-income and communities of color often lack economic flexibility to absorb these rising costs.

Extreme temperatures and weather from climate change pose a severe danger in a natural disaster and will exacerbate chronic health conditions that inadequate neighborhood design furthers. Without action, climate change will result in serious health repercussions, including more heat-related disorders, food insecurity, and mental health conditions, and continued disparate impacts on low-income and communities of color. If California is going to make a meaningful impact towards increasing the resilience of communities, particularly those who will be most impacted by climate change, then these communities need to be at the center of our efforts. Below are several recommendations to help strengthen this, and future, reports to help improve community resilience in the face of climate change:

Recommendations
Improve community engagement processes by reaching out to community first. Too often state agencies develop reports and recommendations before asking the community their needs and solutions, which is often counterproductive and could result in harmful recommendations rather than improvements in health. Therefore, state agencies must ***START*** with a community engagement process by talking with community residents first to understand their needs, concerns, and ideas. Then, with these concerns and issues in mind, develop recommendations for community review and approval. In addition, this report should define and provides examples of what "community" is. For example, some populations were mentioned very little if at all in *Safeguarding California 2017*, such as the prison population, disabled or elderly communities, and schools. These definitions should be developed in concert with community leaders working on climate justice and health equity issues.

Ensure proper compensation for community input. Community members are experts in their own right. They understand and have solutions for how climate change will impact their lives, yet they are often not given the respect or recognition they deserve. Moving forward, the state should offer compensation for community participation in meetings or other input sessions. In addition, the state should include requirements for future grant or contract opportunities to include working with community based organizations, community residents, or other community engagement activities to ensure that those most impacted are better engaged in this process. Finally, true community participatory research (run by community) should be prioritized and justly compensated to help improve the data available and better inform recommendations.

Make future resources contingent upon implementing this report. While this report itself does not have resources attached to its goals and policies, billions of dollars are provided for the implementation of state and local projects for housing, development, transportation, and other infrastructure projects every year. Yet, at times, these projects are not tied to climate adaptation projects or goals. Therefore, moving forward, we must ensure that our state adaptation goals are also tied to the resources provided for infrastructure development and improvement, with an emphasis on targeting the needs of vulnerable communities and identifying specific funding for community efforts. In addition, agencies should not fund projects that may result in extreme harm to vulnerable communities; they must find ways to reduce harm such as including adaptive management strategies. The adverse impacts review process should be integrated into the policy planning process.

Strengthen transparency and accountability processes to measure achievements under the report. The success of the goals of this report are contingent upon strong forward movement by all sectors and improved systemic practices towards climate adaptation and mitigation. Yet the audience of the report is unclear and should be clarified to ensure everyone understands who to hold accountable for future efforts. In addition, it is critical that the report emphasize how sectors will be held accountable for achieving the goals through an ongoing, regular feedback process as well as how agencies will improve collaboration with each other, local governments, and community environmental justice efforts. Finally, rather than only connecting with community on updates of this report, the state should identify opportunities to regularly connect with communities, especially at the local and regional levels, to track and monitor progress, best practices, and provide updates to community partners, organizations, and other interested parties. State and local agencies and departments should also identify opportunities to conduct more effective community outreach including greater language diversity; more inclusive messengers such as youth; and more relevant, consumer friendly information, which includes making the *Safeguarding Report* more accessible to community.

Create an advisory committee that includes community representatives. An important way to create greater connection with community, and improve accountability and transparency, is to create an advisory committee that includes community leaders and representatives, who also hold decision-making authority around the report. The committee could also help to provide technical assistance on community engagement, greater linkages between the state and local efforts, and ways to include a more targeted focus on health, equity, and environmental justice.

Identify opportunities for regional discussions. In terms of structure, we recommend including a regional discussion in addition to the overall statewide strategy. Each region of the state faces different challenges given the different environmental, economic and social factors it faces. A regionally specific discussion can describe how these strategies could be deployed cumulatively to have a more holistic impact on public health. A regional discussion should include a more focused discussion on barriers or challenges specific to the region and how the state might help groups overcome those challenges.

Encourage greater collaboration among state and local agencies and departments on developing recommendations. This report should further collaboration between state and local agencies and departments to identify cross-cutting themes and solutions to climate change. Currently, each sector has its own section and develops its own recommendations without input from other agencies or departments. While there is a larger recommendation on collaboration between state and local governments, it is lacking concrete suggestions and goals, which could and should be informed by regional or local community discussions. Climate change will not affect just one sector. For example, climate change poses multiple threats to certain communities such as those with mixed residential and industrial zones, or where there are toxic chemicals and potential sea level rise, or areas with increasing heat waves and prisons without air conditioning. In addition to working across sectors to tackle these impending challenges, state and local agencies should be encouraged to work together to inform goals and recommendations, especially given local governments' planning authority. State and local governments should also share data and other useful information helpful in developing more informed recommendations. In addition, the policy recommendations should provide more concrete action steps towards achieving the larger goals outlined in the report.

Identify health, equity, anti-displacement, and environmental justice solutions through each chapter. Each sector provides an important vision for moving forward; however, there is a lack of focus on the most vulnerable communities and the health impacts of climate change. Therefore, a recommendation going forward is to thread priorities such as health, equity, anti-displacement, and environmental justice through each of the sectors to ensure that there is a prioritization of those communities most impacted, with the least resources, to address climate change.

Expand tools to identify vulnerable communities. The Safeguarding Plan requires a system to identify vulnerable populations and communities that are disproportionately affected by climate change impacts. Suggested tools to use include: CalEnviroScreen, the Environmental Justice Screening Method and the Health Disadvantage Index[1] to identify climate change threats. The State must use accurate data that is updated at least every 2 years as they develop climate adaptation policies.

Identify actions that meet goals of climate mitigation and climate adaptation, especially in vulnerable communities. Projects funded by the Greenhouse Gas Reduction Fund can have adaptation co-benefits for vulnerable communities. The state must seek funding opportunities from private and public sources to make meaningful climate adaptation investments. Sectors should implement actions that can simultaneously reduce GHG emissions and also make vulnerable communities more resilient.

Safeguarding California must prepare for unintended adverse consequences and include adaptive management strategies. Every sector plan must incorporate strategies that prepare for unintended negative consequences, such as displacement, that may occur when vulnerable communities are forced to relocate during extreme weather events. A model to follow is the Scoping Plan that ARB is required to prepare under AB 32 to explain California's approach to climate mitigation. The Plan requires ARB to evaluate the environmental and public health impacts of the Scoping Plan. *Safeguarding California* needs to include a similar mechanism that assesses impacts resulting from climate adaptation policies. Mechanisms such as adaptive management strategies can help address unintended negative impacts and allow for flexible changes in the future.

Below are the compiled suggestions for particular sector reports from the convening:

Public Health
- **Better connect to ongoing community efforts to understand and identify how vulnerable communities are prioritizing and addressing these issues.** Many organizations around the state are working closely on climate change and the negative impacts of environmental pollution. The public health sector should include better connections to this work and how we can advance these efforts simultaneously.
- **Map multiple health factors impacting climate change:** The public health sector should take the lead in identify areas in which multiple public health threats could compound the

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[1] The HDI identifies communities that may be missed by CES because they do not experience as much toxics exposure, but have numerous social, economic and place-based inequities, making them a climate vulnerable community. http://phasocal.org/ca-hdi/.

impacts of climate change such as toxic soil, sea level rise, poor air quality and the presence of communities with greater health disparities.

- **Provide examples of local/state or regional partnerships with community based organizations or partners.** The public health sector should do more to elevate many of the community and local public health department collaborations on climate change.
- **Move metrics into the chapter:** Any metrics being proposed that seek to address or monitor health impacts should be included within the sector report instead of being located in an appendix.
- **Tie public health planning to climate change planning:** As public health departments are making inroads on health in all policies and greater population health issues, climate change mitigation and adaptation efforts should be considered.
- **Partner with community organizations to conduct research:** While we applaud efforts to conduct more research, the public health sector should emphasize the importance of partners with community based organizations who are already conducting community based research.
- **Expand partnerships beyond local public health departments:** This sector should also look to expand partnerships beyond local health departments to community partners and organizations who can provide new, unique and important perspectives on bridges gaps with community and improving the community engagement process.

Access to Water

- **Water rights access:** Define the "right to water" and state this as a value for the report. Identify and note differences between rural and urban residential water usage and identify equitable use to set goals and objectives for improving access. Set goals for a diverse water supply –especially given our fragmented regulation of water including private wells, public water, and other systems. Any assessment should also include an access of water and rain in the larger context of climate change, including snow packs and groundwater depletion.
- **Water infrastructure:** Identify and develop ways to monitor and use grey and black water; assess our current and future infrastructure needs; and identify ways that other industries including technology, agriculture, dairy, and others are responsible for assisting with the development and strengthening of our water systems.
- **Connections to agriculture and food:** Factor in water usage by industry, including the agricultural, cattle and dairy industries. Additionally, monitor how increased periods of drought affect jobs and other economic opportunities as the impacts of climate change on food and agriculture reverberate widely.
- **Chemicals and pesticides in water sources:** Chemicals and pesticides often wind up in water sources either from runoff or other contamination which can affect both ocean and water systems. Identify potential financial incentives to cut usage and improve water quality by measuring impacts of toxics and chemicals. Identify ways chemicals and toxics issues run through all chapters, as climate change can exacerbate toxics exposure across multiple sectors.

Oceans and Sea Level Rise

- **Sea level rise:** There are triggers and impacts related to the contamination of the ocean, soil erosion and the resulting rise of the sea level. Issues including displacement and

strengthening infrastructure such as levies need to be addressed. Mapping potential flood areas should be a priority.
- **Ocean Acidification:** Economic impacts of acidification should be address as jobs will be lost due shortened seasons, changing pH levels, and increased temperatures. Food quality issues should be addressed as we look at the depletion of the food supply.

Land Use and Community Development
- **Acknowledge impacts of land use on resilience:** The report should acknowledge the impacts of land use policies and planning on a city and community's ability to be healthy and resilient including accessing affordable, quality housing, which is not mentioned in this sector.
- **Model sector's discussion of anti-displacement:** A positive aspect of this sector is the attention on economic development and anti-displacement strategies. The report should replicate this discussion in other sectors.

Transportation
- **Acknowledge role of transportation on health:** Transportation plays a significant role in connecting people to well-paying jobs, affordable housing, and improving economic opportunities in vulnerable communities in addition to its tremendous impacts on air quality. The report should identify goals that include having a strong public transportation system that addresses community needs, provides more options to improve resilience such as investing in bus systems, and identifies community points of vulnerability (not just transportation sector's).
- **Update transportation plans and goals:** Many transportation plans were created years ago yet we have made great strides in identifying and addressing climate change. Therefore, these plans should be further updated with a focus on reviewing older proposed projects – to ensure they are still relevant based on current needs, opportunities, and climate change goals.
- **Address transportation equity issues:** Several issues are not adequately addressed in the report such as accessibility for low-income, disabled, elderly and other communities, and differences in access between rural, urban or suburban areas. These issues should be further accessed and addressed in the report and how a community's climate resilience will be impacted.
- **Create concrete policy goals**: The report should create real and concrete policy goals to track and monitor progress. There is need for more specificity of recommendations in active transportation such as specific goals for bike sharing, improving walking and biking, and moving away from the reliance on fossil fuels.
- **Goods movement and industry:** Industries must also have climate change in mind. They should be tasked with developing a climate adaptation/resilience plan that not only looks at how the port is resilient but also how port activity can support and build community resilience. The report should also include strategies on working towards zero or near zero emissions for goods movement (link expansion efforts to pollution cleanup).
- **Education and outreach:** It is critical for public transportation systems to be coordinated so that when there are emergencies they can help with evacuation efforts. We should start these efforts now.

Energy
- **Public health and energy:** The recommendations and resulting activities are very siloed but there are cross-sector connections. Local energy and utility departments should be encouraged to coordinate with public health departments to address short and long term issues pertaining to climate change and health. For example, how can we help communities prepare for energy outages and surges? How do we advocate for clean energy technologies to protect the most vulnerable (people in emergency shelters, community centers, etc.) in the case of an outage or power surge? How are we prepared for disasters to ensure that diverse communities can be reached in language appropriate ways when power lines go down? What other places should be prioritized in the case of power outages such as homeless/emergency shelters, churches? Where are their accessible places for these communities in case of an emergency?
- **Access to clean infrastructure:** We should be identifying ways to ensure that vulnerable communities have access to cleaner, more affordable energy sources such as solar on low-income housing and for low-income communities, more fuel efficient cars, and energy efficient household appliances. Electric car charging stations should be placed in more economically appropriate places and in a variety of communities, instead of just in private parking garages.
- **Encourage community owned solar:** The state and local governments should be encouraging pilot projects to elevate projects such as in Richmond and Oakland Chinatown to the community-level (also note LADWP community solar pilot project as a model).
- **Investment without displacement:** Our policies must ensure that clean energy investments are not creating displacement by increasing housing and other cost of living. Housing and cost of living experiences should be more central to the report because it affects numerous aspects of energy policies.
- **Start with the youth:** It is important that our policies ensure that youth are empowered to grow into a leadership capacity in their communities. In addition, the state should invest more in funding for this work including training, local hire policies, job transition, and renewable job training programs.
- **Outreach and engagement:** The state needs to invest in outreach and education about conservation in a culturally and linguistically appropriate way, ensuring that there is reach to populations most impacted by increases in energy prices, such as the elderly, disabled, and low-income families. The state should partner with community organizations to help with outreach, potentially targeting local youth to build energy literacy. Utility companies should address long term planning and infrastructure especially for vulnerable communities. For example, PG&E has a Better Together: Resilient Communities grant focused on wildfire risk, which could be an example.
- **West Oakland as a case study:** While the Port is an economic engine it is also responsible for a great deal of pollution, much of which comes from the diesel trucks. Local land use planning puts schools and affordable housing near the Port, freeways, and other areas with high pollution yet there is not planning or incentives to move towards zero emissions or improved energy efficiency. For example, there were no electric charging stations proposed for trucks near the Port even though the state funded the city for infrastructure. In addition, new warehouses built near the Port do not have solar panels. Future projects should have incentives built into them to require alternative/clean energy towards the goal of reducing emissions.

Again, thank you for the opportunity to comment on this report. While it is an important effort, there are many improvements that could be made to the report going forward that would make huge strides towards improving community resilience in the face of climate change.

Sincerely,
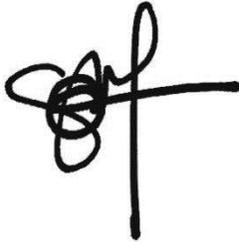
Sarah de Guia, JD
Executive Director

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[i] "California's Tomorrow: Equity is the Superior Growth Model." PolicyLink and USC Program for Environmental and Regional Equity. Available at: www.policylink.org

[ii] "California's Future: Population." Public Policy Institute of California by Hans Johnson. January 2014. Available at: http://www.ppic.org/content/pubs/report/R_114HJ3R.pdf.

[iii] "California's New Majority." The Greenlining Institute. 2010. Available at: www.greenlining.org.

[iv] Public Policy Institute of California. Just the Facts: Poverty in California. Dec. 2015. Available at: http://www.ppic.org/main/publication_show.asp?i=261

[v] "American Community Survey, 2007" U.S. Census Bureau. May 7, 2009, www.census.gov/acs/www/

[vi] Public Policy Institute of California. California's Future: Population. Feb. 2015. Available at: http://www.ppic.org/content/pubs/report/R_215HJ3R.pdf

[vii] Ibid.