



WESTERN AGRICULTURAL PROCESSORS
ASSOCIATION



Forest Landowners
OF CALIFORNIA



May 17, 2019

The Honorable Richard Bloom
State Capitol, Room 2003
Sacramento, CA 95814

RE: AB 2528 (Bloom). Climate Adaptation. (As Amended on April 24, 2018)
OPPOSE UNLESS AMENDED

Dear Assembly Member Bloom:

The following groups wish to express our position of oppose unless amended on AB 2528 which would add habitat resilience areas to the updates required in the Safeguarding California Plan.

Under existing law, there are nine sectors where agencies are required to identify vulnerabilities to climate change including: water, transportation, energy, public health, agriculture, emergency services, forestry, biodiversity and habitat, and ocean and coastal resources. There is nothing in existing law that precludes additional sectors from being included in the Safeguarding California Plan by agencies that deem it appropriate, nor is there a specific need for the bill since existing law already requires habitat and diversity to be addressed in the Safeguarding California Plan.

AB 2528 further defines habitat reliance areas to include areas of stronghold (any watershed that currently supports the largest populations of fish in each bioregion within the state or a watershed that supports populations of fish with critical genetic diversity essential for the recovery of those fish species), source waters (Cascade Mountains, Modoc Plateau, and Feather River headwaters that provides groundwater recharge to extensive volcanic aquifers that store and release large quantities of groundwater to spring-fed rivers), coastal estuaries over two acres in size, and mountain meadows (Sierra Nevada, Modoc Plateau, Warner Mountains, Southern Cascades, or Sierra or Cascade foothills).

Our concern is that this bill dramatically expands areas across the state calling for the identification, protection and further enhancement of strongholds, source waters, coastal estuaries and mountain meadows. Particularly concerning, is the call to protect strongholds. Most of our industries take great

care to protect areas where there are candidate species, threatened species and endangered species. Under AB 2528, the intent is to protect areas where there is no threat to species, and instead the species are doing well. There is great concern that this bill would punish landowners that have managed their lands in a way to enhance the habitat of nearby species.

We would like to offer amendments to AB 2528 that would remove our opposition. Rather than calling for the protection and enhancement of these areas, AB 2528 should identify areas that are considered a stronghold in order to replicate successes and identify incentives to landowners who manage their lands in a way that is consistent with the state's goals. The author and sponsor should specifically consider looking at Private Lands Management (PLM) program which offers landowners incentives to manage their lands for the benefit of wildlife. Landowners who enroll in PLM program consult with biologists to make biologically sound habitat improvements that benefit wildlife, like providing water sources, planting native plants for food, and making brush piles for cover. This partnership between wildlife managers and private landowners helps conserve and maintain wildlife habitat in our state. AB 2528 could do something very similar with fishing license revenues and tie it to efforts to improve habitat for game fish species.

For the reasons listed above, we have taken a position of oppose unless amended on AB 2528. We are open to further conversations to close the gap with the sponsors and reach a compromise. If you have any questions regarding this matter, please do not hesitate to contact any of the individuals listed below.

Sincerely,

California Association of Nurseries and Garden Centers
California Building Industry Association
California Chamber of Commerce
California Cotton Ginners and Growers Association
California Farm Bureau Federation
California Forestry Association
California Fresh Fruit Association
California Licensed Foresters Association
Western Agricultural Processors Association

cc: Assembly Member Lorena Gonzalez Fletcher, Chair Assembly Appropriations Committee
Assembly Member Frank Bigelow, Vice Chair Assembly Appropriations Committee
Assembly Members, Assembly Appropriations Committee
Jennifer Galehouse, Deputy Chief Consultant, Assembly Appropriations Committee
John Kennedy, Assembly Republican Caucus
Jared Yoshiki, Assembly Republican Caucus