

March 13, 2015

Susan Naramore
Division of Financial Assistance
California Department of Housing & Community Development

RE: Phase I Application for the National Disaster Resilience Competition (NDRC)

Dear Ms. Naramore,

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) applauds the state's proposal for a Community Resilience and Forest Stewardship Program (CRFSP). We are grateful for the opportunity to support the proposal's goals by providing comments on the State's Phase I NDRC proposal.

ARCCA is a network comprised of existing regional collaboratives from across California. ARCCA's members represent leading regional collaboratives that are already coordinating and supporting climate adaptation efforts in their own regions in order to enhance public health, protect natural systems, build economies, and improve quality of life. Through ARCCA, member regional collaboratives have come together to amplify and solidify their individual efforts, as well as to give a stronger voice to regionalism at the state and federal levels. ARCCA members share information among regions on best practices and lessons learned; identify each region's most innovative and successful strategies; and then determine how these strategies could be adapted to another region's particular needs. As a result, ARCCA bolsters the efforts of member regional collaboratives and empowers those interested in forging new regional partnerships.

From our regional adaptation perspective, realizing this program's goal of "transitioning to a sustainable forest economy in our rural communities" will require unprecedented coordination and collaboration for all parties involved. This coordination, starts with defining a shared set of goals and principles that strive to balance economic, social and environmental needs among all affected parties. While we feel this proposal references some of these common goals and principles, we feel it could be more strongly articulated. Specifically, there are seven guiding principles in the Safeguarding California Plan to which this proposal could more clearly link. We would further suggest you consider the Principles of Adaptation developed by ARCCA (and attached to this letter for your reference), as they cast a somewhat wider net and specifically connect with local needs.

That being said, we feel the overall program concept is strong: The network of participants and program design will provide a strong base for community engagement and ownership. Recognizing that this is a draft proposal of an initial concept, our members who reviewed the draft did have a number of general and some specific comments for consideration.

First and foremost, the program design is not defined in a way that is easily understandable, nor is it clear what specifically is going to be accomplished, why the program is innovative, nor why it is likely to succeed. The earliest mention of specific "activities" is not until page 36. The following timing and approach section on page 38 does not provide details to evaluate the "innovation" of the program. Additional discussion about innovative activities would strengthen the proposal and make clearer how it will result in lasting change. More specifically, the sustainable forest management case should be strengthened, as well as how building local capacity and attaining local buy-in for this transition is a part of the overall strategy. As noted above, development of well-founded and shared goals for this transition are critical to ensuring success.

This program is fundamentally about community resiliency. To that end, we are very encouraged and support the inclusion of a formal steering committee to ensure there is consistent and outside input throughout. However, we do not see the role of local or regional governments as agents of change clearly articulated outside of including the Local Government Commission on the steering committee, which is a sound choice for statewide perspective. This gap is further apparent on page 36 when the proposal outlines some details of the activities, but lacks a strong community engagement piece. There is also a lack of clarity about roles and expectations for the

"Oversight Steering Committee" and "Leadership Partners" mentioned on page 12 and the "Leadership Team" referenced on page 22. To build long-term sustainability of this program and to truly transform the economics of the region, local government agreement is key. Therefore, we imagine that such a program would include activities such as cultivation of stakeholder networks, development of supportive policies, and sharing of economic models that will build the case for this transition over time and at scale. To that end we suggest 1) more clearly identifying the local engagement piece in the activities, 2) including a local policy / elected official working group be added to the process to ensure that local governments in the Sierra region are directly engaged from the outset, and 3) setting up this local working group to be a longer-term regional body who can carry the work forward post NDRC.

We additionally suggest that the scale of impact of the Rim Fire on the region could be more strongly described: It was the largest wildfire in the Sierra's recorded history; almost 40% burned at destructive high intensity, producing GHG emissions equivalent to 2.3 million vehicles for a year. Additional details could be added about the economic impacts (e.g. San Francisco PUC had to purchase alternative energy due to damage done to hydropower facilities, losses in visits/lodging receipts of some \$2.75 million). In parallel to making a stronger case for the direct regional impact is to enhance the level of detail regarding the additional benefits the Sierra Nevada provides to the rest of the state such as carbon storage to assist with addressing climate change impacts, a significant wood product industry, 55% of the State's overall hydropower equaling 15% of the State's overall energy per year, and crucial habitat for key species, some of which are only found in the Sierra. A stronger connection between rural resources areas and the downstream communities that depend on those resources would enhance this proposal as a whole by showing why it is so important for the region and the state as a whole.

In addition to these general comments, we offer the following more specific points for consideration:

- P9: Suggest strengthening the subsections on meeting national objectives, achieving overall benefits, and establishing tie-back to the actual disaster by providing some examples of "how" the program would do this, rather than just repeating the guideline language.
- P16: Some state programs (ARCCA and CivicSpark) are listed as examples of current efforts to engage local governments. It would be helpful to describe how these (and possibly others) might be leveraged to ensure local success, and statewide dissemination. The description of ARCCA could be strengthened by adding a little more information on what ARCCA members do within their communities and how the five members together are working to strengthen connections between rural areas, like Tuolumne County, that provide many resources and the urban areas, like San Francisco, that rely on those resources. Similarly, CivicSpark could be included as a component of the workforce development plan.
- P19: In the first paragraph that talks about the USFS expertise, suggest adding mention of the [USFS Experimental Forests](#), including the Stanislaus-Tuolumne Experimental Forest, which have been collecting research data since the 1920s on harvest protocols, forest treatments and seed production.
- P36: Regarding job training and small business development goals consider adding a connection to the [Merced Small Business Development Center](#) that serves the Tuolumne County area.
- P37: Co-benefits and integrated thinking could be better articulated. There are a host of tangible upstream and downstream economic and environmental benefits that are mentioned generally in other places, but are not included or expanded on here (such as linking to research on [public health benefits](#)). The potential to transform the rural economy while providing disaster relief is both extensive, and a model for other communities throughout California that could be better described.
- P38-39: Developing [green infrastructure](#) is a great approach for this program, but what green infrastructure is and how its advantageous to this program is not clearly defined or connected to the proposal.
- P39: How success is defined is not clearly articulated. For example: How many people will be trained? How many acres do you see transitioning? Are there community economic indicators or forest health indicators that could be referenced as measures for success?

We hope you find these contributions helpful, and welcome any opportunity to provide clarity or additional information.

Sincerely,



Krista Kline
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The Los Angeles Regional Collaborative



Larry Greene
ARCCA Vice-Chair
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Introduction to Principles of Adaptation¹

Climate change is happening now, and is expected to accelerate in the years ahead. California's economy, infrastructure, public health and natural systems will be significantly impacted by extreme storm events, flooding, wildfire, heat waves, loss of water supply, air quality degradation and sea level rise. We are facing a historic governing challenge from climate change. A \$2 trillion annual economy and the needs of nearly 40 million residents ride on the outcome of the state's preparations and response.

California is already enacting an initial set of measures intended to prevent, prepare for, and adapt to climate change. While these efforts are an encouraging and positive sign, the measures are spread across a variety of sectors and agencies, and encompass a wide range of initial strategies. Reducing our risks and increasing our resiliency to the changes ahead will require a new and unprecedented degree of collaborative action throughout California. We must begin now to encourage this level of cooperation, starting with a shared set of goals and principles that allow us to balance economic, social and environmental needs as we seek to align state, regional and local governments, and bring them together with community organizations, businesses and other key stakeholders for the benefit of all Californians.

ARCCA Principles of Adaptation

Work Within the Appropriate Scale and With Meaningful Partners

1. **Focus on the Regional Level**

Communities are already bound together at a regional scale by shared geography and mutual reliance on certain resources. Additionally, local and regional adaptation efforts are more likely to have common goals, and be more nimble in application than efforts across broader, less connected geographic areas. For these reasons communities should work together inter-regionally on adaptation. All of these efforts should be in coordination with state and federal agencies active in this area to preserve resources, avoid duplication, and align with existing jurisdictional authority (MPOs, COGs, Water Districts, IRWMPs, AQMDs, etc.).

2. **Consider Health, Safety, and Equity of all Californians**

Adapting to climate change is fundamentally about protecting people and the communities and resources we rely upon. Actions to increase resiliency and reduce risk must prioritize the health and safety of all Californians, especially our most vulnerable, by devising solutions that simultaneously encourage economic growth, improve environmental quality, and increase opportunity for all.

3. **Empower Collaboration Across All Sectors and Levels of Leadership**

Empower action by establishing and/or expanding traditional and non-traditional alliances and networks to accelerate effective and durable problem-solving (e.g., between/among public and private resource managers, scientists, decision-makers); share knowledge openly and actively; regularly engage the public on the science as well as solutions; and build capacity for local community action. This includes

¹ The introductory text and principles are adapted from concepts, and language utilized in a number of key adaptation related resources and reports; The 2014 [Safeguarding California Plan](#), the 2014 Little Hoover Commission [Report on Climate Change Adaptation](#), National Wildlife Federation's [Climate Smart Principles](#) as framed by Point Blue Conservation Science, the [Ahwahnee Principles for Climate Change](#), the California Adaptation Forum [Action Framework](#), [2014 California Economic Summit](#), [Resilient Rhode Island Act of 2014](#) (2592), the 2014 [New York Community Risk and Resiliency Act](#), and content taken from ARCCA's various comment letters to state agencies

developing peer-to-peer horizontal linkages and vertical linkages across levels of leadership and related geographic areas to ensure economies of scale and consistency of effort.

4. **Provide Consistency at the State Level**

The State of California should provide access to the best-available climate science, standardized sources of climate change information, and sophisticated risk assessment tools which help local governments, regional agencies and other climate practitioners take climate action to prepare for the impacts of climate change and make their communities more resilient to its effects.

Employ Key Strategies

5. **Utilize Existing Policy Mechanisms**

In order to minimize disruptions and maximize existing institutional capacities in the face of change and uncertainty, adaptation should be integrated throughout existing local, regional and state plans, policies and decision-making, rather than creating new stand-alone policies.

6. **Prioritize Multiple Benefits**

Because adapting to climate change will require significant resource investments, great changes to the status quo, and engagement of people from all sectors of society, it is important to prioritize those actions that yield the greatest collective benefits. For example; adopt landscape or watershed scale analyses; focus on natural system function and services; establish a preference for green or nature-based responses to the maximum extent feasible; evaluate changes in carbon stocks and give preference to actions that also help reduce the source of climate change – GHG emissions.

7. **Employ Forward-Looking, Adaptive Management Approaches**

In order to realize timely, effective responses to continual change in climate, ecology and economics, as well as the evolution of our understanding due to new research and data, employ an adaptive management framework with regular monitoring and reassessments with a meaningful time horizon, at least up to 2050.

8. **Invest In Resiliency**

Public dollars, as well as private, should be prioritized to invest in developing state, regional and local policies and projects that reduce our risks and increase our resiliency. Mitigating our GHG emissions and preparing for the impacts of climate change through targeted and smart investments can give California a competitive advantage over other states that are ill-prepared to deal with climate change and its effects.