

January 9, 2016

Mackenzie Wieser
Strategic Growth Council
1400 Tenth Street
Sacramento, CA 95814

RE: Transformative Climate Communities Program Draft Scoping Guidelines

Dear Mackenzie Wieser:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments on the Transformative Climate Communities Program Draft Scoping Guidelines (Guidelines).

ARCCA is a network of existing regional collaboratives from across California. Our members are coordinating and supporting climate adaptation efforts in their own regions to enhance public health, protect natural systems, build economies, and improve quality of life. Through ARCCA, member regional collaboratives 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 on best practices and lessons learned; identify each region’s most innovative and successful strategies; and determine how these strategies could be adapted to another region’s particular needs. As a result, ARCCA bolsters the efforts of member collaboratives and empowers those interested in forging new regional partnerships.

We offer a few comments and recommendations for consideration to improve the Guidelines to better achieve the goals of the Transformative Climate Communities Program (Program).

1. We encourage SGC to streamline all phases of the application process and reporting requirements in order to encourage truly comprehensive planning and implementation despite limited local capacity in the disadvantaged communities that the Program is targeting.
 - a. We support SGC’s intent to streamline the application process, but some of the structure that is outlined in the Guidelines seems to contradict this intent. Many of the performance criteria are linked and/or overlapping such as GHG reductions and energy goals, and equitable development and anti-displacement. Requiring applicants to address all of these individually could reinforce the kind of complex siloed approach to measures and reporting that the Program is trying to diminish.
 - b. We recommend SGC coordinate with state agencies administering GGRF funds to streamline all reporting requirements for the Program. Streamlining reporting requirements can encourage integration across departments and sectors at the local

level to develop more comprehensive plans and projects, and can help to lift the administrative burden of managing multiple requirements that have common goals. This will also help to reduce administrative costs thus maximizing the State's investment in disadvantaged communities for transformative and tangible results.

2. We appreciate the technical assistance and support offered to applicants throughout all phases of the application process. As you know, limited capacity in many disadvantaged communities can create additional obstacles for local agencies and organizations to effectively apply for and manage grants. We suggest providing any available and approved templates, resources for developing metrics, and key points of contact in the Guidelines to demonstrate SGC's commitment to providing technical assistance and support.
 - a. Technical assistance for the development of metrics is especially important in order to not unduly burden applicants who are lacking technical capacity in this space. Metrics should be forward looking and provide a platform for integrated measures that can serve as a model for State efforts, as well as efforts in other local communities that are not participating in the Program. Additionally, we suggest including more meaningful metrics (e.g. for community engagement, projects should seek to move beyond engagement and towards empowering local community members – tracking the establishment of community benefits agreements and prolonged engagement of individual community members are more meaningful than the number and location of meetings held), but as metrics become more complex and multifaceted, it diminishes the ability of stakeholders with limited capacity to address them.
 - b. Given consideration to the large amounts of funding that the Program will award, securing a minimum of 100% match funding can create barriers to participation for local parties in the Program's target disadvantaged communities that may lack capacity to secure these funds. We recommend SGC provide substantial technical assistance and support from fundraising and partnership development experts to applicants in order to address this barrier.
3. We greatly appreciate the additional planning grants made available through the Program and recommend SGC also prioritize investments in rural communities. SB 1386 declares it to be the policy of the state that the protection and management of natural and working lands are a key strategy in meeting the state's greenhouse gas reduction goals. The current indicators used for CalEnviroScreen focus primarily on urban areas through an emphasis on pollutants and other criteria that are not measured or do not occur in the very rural communities that encompass much of the state's natural and working lands. While many rural communities need additional support to advance their climate action and resiliency building measures, they are ineligible for GGRF funding dedicated to disadvantaged communities.

- a. We appreciate SGC’s broadened definition of disadvantaged communities, as evident in the Sustainable Communities Planning Grants and Incentives Program, and would like to further recommend SGC prioritize investments in rural communities to ensure that the state's climate strategy deliver economic and health benefits to all California communities, as well as for planning projects that strengthen the urban-rural connection.
 - b. The Affordable Housing and Sustainable Communities (AHSC) program has taken steps to address this issue by creating a separate Rural Innovation Project Area funding category. We urge the Council to take a similar approach within the Transformative Climate Communities Program, in order to better reflect the state’s geographic, economic, and resource diversity.
4. Lastly, we suggest including links to all relevant policies and resources referenced throughout the Guidelines to make it as easy as possible for applicants to be fully informed of the Program’s requirements. Additionally, we encourage SGC to integrate new legislative requirements, as appropriate and relevant to the Program’s goals, into the Guidelines (e.g., SB 379 and SB 1000).

Thank you for your consideration of our comments. We welcome the opportunity to discuss any of our comments further.

Sincerely,



Jonathan Parfrey, ARCCA Chair
*The Los Angeles Regional Collaborative for
Climate Action & Sustainability*



Kerri Timmer, ARCCA Vice Chair
*Sierra Climate Adaptation & Mitigation
Partnership*



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