

March 13, 2017

Strategic Growth Council
1400 Tenth Street
Sacramento, CA 95814

RE: Transformative Climate Communities Program Revised Draft Scoping Guidelines

Dear Strategic Growth Council Staff:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments on the Transformative Climate Communities Program Revised Draft Scoping Guidelines (Guidelines) issued on February 9, 2017.

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 enhance the Guidelines and overall goals of the Transformative Climate Communities Program (TCC) to accelerate greenhouse gas reduction and advance local climate action in disadvantaged communities.

While we appreciate the flexibility of allowing applicants to select six of twelve key strategies to ensure that proposals align with specific community needs, we strongly recommend making climate resiliency a program threshold for proposals to be considered eligible for funding. When considering the TCC goals, ensuring that resilience is integrated into the planning and implementation process for investments is critical to advancing local climate action – especially in communities at the frontlines of harmful impacts.

1. Currently, TCC applicants can choose whether or not to incorporate climate resiliency as one of six strategies in their projects, but as the intense drought and recent severe winter storms demonstrated, California is already beset by climate change impacts, with floods and mudslides overwhelming communities around the state, many of whom will struggle for months to repair infrastructure, clean up contamination, and minimize the cascading health and social implications at high costs. Just last summer, many of these same communities were suffering under extreme heat, which has a direct effect on human health and causes more deaths than

any other type of natural disaster, and prolonged drought, which has burdened many communities whose livelihoods depend on agriculture, land management, or tourism.

2. For California communities, especially low-income and disadvantaged communities, to thrive in the face of drought, extreme rainfall, wildfires, extended heat waves, and other health impacts, climate resiliency absolutely must be accounted for or integrated into all planning and projects. Climate resiliency must be at the heart of a truly transformative community, not an optional strategy. A program as ambitious as the TCC that aims to transform communities according to principles of equity and economic development cannot afford to overlook climate resilience. We all know that climate impacts will have the most severe impacts on our vulnerable and disadvantaged communities. Floods, extreme heat events, and other disasters exact a far higher cost on low-income families, who will struggle to keep up with the costs associated with these events and rebuild scarce assets, impeding their climb out of poverty. Climate resilience affects all dimensions of wellbeing, and embracing climate resiliency as a key program objective would directly support the TCC's vision, goals, and principles. Indeed, neglecting to account for future climate scenarios would make it far more difficult for funded projects to achieve program goals and erode potential gains in critical co-benefits such as health and equity.
3. Making climate resiliency a mandatory objective would adhere to the State of California's approach to adaptation. Executive Order B-30-15 requires state agencies to take climate change into account in their planning and investment decisions by prioritizing actions that both build climate preparedness and reduce GHG emissions. Additionally, AB 2800 (Quirk) requires states to take into account climate impacts when designing, building, and investing in state infrastructure. While TCC funding may not be required to comply with that law, it would benefit all state funding to be expended with foresight for the predicted climate scenarios ahead.
4. We argue that it would not be too onerous for applicants to address climate change and integrate climate resiliency in their grant applications and overall projects, as long as the state provides active outreach and support on their excellent climate adaptation tools and resources, including Cal-Adapt. In fact, climate resilience is already woven throughout the TCC's multiple strategies in that it is almost redundant to have it as its own separate strategy. The strategies of urban greening and green infrastructure, water efficiency, and robust food systems – just to name a few – all contribute to building local neighborhood-level resilience. With limited funding opportunities for climate adaptation, TCC provides a unique opportunity to demonstrate the fundamental connection between mitigation and adaptation. By making climate resiliency central to the program SGC can help to transform State climate change investments to become more holistic and integrated.

However, if climate resiliency were retained as a strategy, its indicators need to be improved upon from the current selection. Even if a community were to do everything possible to build resilience, it could

have little effect on the number of extreme heat days or sea-level rise. Tracking these indicators would be meaningless except on a far longer timescale, as natural variability plays a great role in weather. We would suggest focusing the indicators on preparedness actions and good practices, such as community conversations and engagement events around climate resilience; plans and projects that actively incorporate future climate scenarios; emergency outreach plans and preparedness actions, especially those targeted toward frontline (e.g., disadvantaged, vulnerable, and isolated) communities; community resilience centers and cooling stations; integrated hazard mitigation and adaptation plans; and other actions and projects that actively reduce vulnerability and enhance climate resilience at multiple scales.

Thank you for your consideration of our comments. We welcome the opportunity to discuss any of our comments further. We look forward to the continuation of this important program and hope that it can be expanded in future years to address additional communities in need.

Sincerely,



Jonathan Parfrey, ARCCA Chair

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Climate Action & Sustainability*



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