

March 9, 2018

Wildlife Conservation Board c/o CDFW
1416 9th Street, Room 1266
Sacramento, CA 95814

RE: Draft Climate Adaptation and Resiliency Program Guidelines

Dear Mr. Donnelly,

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments on the Draft Guidelines for the new Climate Adaptation and Resiliency Program created by AB-109 (Guidelines).

ARCCA is a robust network of leading regional climate collaboratives – each encompassing a diverse group of public agencies, nonprofits, universities, and private sector companies – working together to build resilience to climate change impacts throughout California. As a statewide network, ARCCA brings together some of the leading voices and thinkers on climate adaptation at all levels of society.

We strongly support the program’s goals of bolstering the ability of California’s natural and working lands and wildlife to adapt to the growing impacts of climate change. The urban-rural provisions are especially important for achieving the goals outlined in the Guidelines as extreme events including wildfires, tree mortality, and extreme drought also affect downstream urban communities that rely on the resources coming from rural parts of the state. We also strongly advocate for provisions for co-benefits that support diverse state goals including carbon sequestration, economic development, and long-term community and natural/working lands resilience.

We offer a few comments and recommendations for consideration, which have been organized to align with the layout of the Guidelines:

1.3 Program Funding and Objectives

1. To the extent feasible, we propose the following addition to this language:

The remainder of the funds may also be used to develop and implement natural and working lands adaptation and resiliency planning that prioritizes the conservation and management of natural and working lands, provides technical assistance for natural and working land managers in both urban and rural areas including local governments, regional collaboratives administered by universities or non-profit organizations, publicly-owned utilities, special districts, and other supporting organizations, and supports efforts that improve rural-urban coordination and expand local and regional capacity for climate change adaptation.

2.1 Eligible Grant Applicants

2. We support the inclusion of local governments as eligible applicants. Local governments are critical to engage in partnerships that advance the urban-rural connection and to accelerate

efforts that strengthen the resiliency of natural and working lands in both urban areas and in forests and watersheds that downstream communities depend upon.

3. We recommend the addition of special districts and publicly-owned utilities as eligible grant applicants. These may include but are not limited to groundwater authorities with interest in supportive land uses, local energy utilities with significant emissions in search of carbon sinks, and wastewater utilities with extensive buffer lands. In any given region, the entity most capable of organizing a project that could successfully apply for funding will vary. This is particularly important for the 40% of the funding that will be allocated to actual project planning and implementation.

Eligible Activities and Priorities

4. Urban-rural coordination is critical for investments in mutually beneficial ecosystem restoration and working lands conservation. We support the technical assistance and guidance provisions and suggest expanding eligible recipients to ensure opportunities for a broad base of supporting organizations to participate. We recommend prioritizing regional and cross-sectoral collaboration to avoid maladaptive practices and strengthens alignment across urban and rural efforts to achieve the program's goals and support lasting partnerships.
5. We recommend setting aside funds targeted for rural and low-income communities. A significant portion of the state's natural and working lands exist in rural, low-income communities throughout the state as defined by AB-1550. As such, climate investments in these areas offer the opportunity to boost resilience to future climate conditions on natural and working lands and invest much-needed resources to support the health and vibrancy of rural, low-income communities. We recommended creating a low-income and/or rural set-aside that is greater than the amount required by the Air Resources Board's guidelines on allocations to low income and disadvantaged communities. We suggest updating the Guidelines to more effectively address rural poverty experienced in the enormous geographic areas throughout the state that are not considered "disadvantaged" communities including the North Coast/State, Central Coast, Inland Empire, and Sierra Nevada.
6. Funding decisions in the Implementation category should be determined based on added co-benefits such as carbon sequestration and capacity building for communities living in or managing natural and working lands as an investment in continued and long-term adaptive management. Economic co-benefits build the capacity of communities to increase investment in the resilience of natural and working lands, as well as corresponding wildlife habitats. To address this consideration, we propose the following modifications to the language in this section
Grants may provide for projects that restore or enhance habitats on natural and working lands in both rural and urban areas that result in ~~direct and measurable~~ recognizable climate change resilience benefits to wildlife and/or expanded capacity for land-based carbon storage for at least 50 years. Grants may also support projects that expand regional capacity for processing the products of natural and working lands (e.g. crops, fibers, textiles and wood products) to better support new markets and regional economic development.
7. We propose the following additions to the language for Planning activities:
These efforts may provide direct guidance for future restoration and enhancement projects, sustainable land use strategic planning, implementation strategies, economic feasibility and

market studies or project specific activities such as preliminary design, ~~and~~ environmental review, and site characterization and testing to validate assumptions and adequately scope project opportunities.

8. We propose the following additions to the language for Technical Assistance activities:
Grants may be used to provide guidance and technical assistance to natural and working lands managers and other supporting organizations, or support efforts that improve the rural-urban coordination on climate change adaptation, and that result in or lead to direct and measurable climate change adaptation benefits.
9. We support the provision for achieving co-benefits in eligible projects. Supporting projects with multiple co-benefits is crucial to achieving the State's climate goals including carbon sequestration, climate change mitigation, and the implementation of several existing and forthcoming state plans such as the Bioenergy Action Plan and the Forest Carbon Plan. Both plans call for investments that expand the state's bioenergy infrastructure, reduce fire risk, and increase carbon sequestration in California's forests. We recommend including projects that achieve goals outlined in the aforementioned plans and clarifying if GHG emissions reduction (including land-based carbon sequestration) is considered a co-benefit or an absolute program requirement.

2.3 Eligible Project Types

10. We suggest the following modifications to the language:
WCB will allocate Program funds to projects that provide adaptation and resilience to wildlife populations in the face of climate change with an emphasis on protecting, enhancing and restoring habitats most ~~resilient~~ vulnerable to climate change and with the greatest capacity for long-term success.
11. This section introduces the requirement that projects *facilitate GHG emissions reduction*, which is not been mentioned in earlier portions of the Guidelines. We recommend providing clearer guidance throughout the Guidelines on how applications will be scored in regards to GHG emissions reduction versus adaptation.
12. We recommend including projects that build local and regional capacity to process the products of natural and working lands and growing markets for these products to support rural economic development as an eligible project type. Capacity-building activities could include inter-jurisdictional and regional coordination, technical assistance for grant applications, partnership and coalition-building, outreach and education, and community engagement.

3.2 Project Submittal Process

13. Due to the often complex and conflicting methods for quantifying carbon sequestration, adaptation benefits, and greenhouse gas emissions reductions on natural and working lands, the reporting requirements of grant programs can often be cumbersome, time-consuming, and overly burdensome for communities that demonstrate the greatest need, as well as for innovative pilot projects. We recommend providing technical assistance and additional requirements for applicants who pass the pre-application stage. This is particularly important

given the multiple objectives related to both climate change mitigation and adaptation stated in the Guidelines.

3.3 Project Review and Selection Process

14. We recommend providing additional guidance for the pre-application to clearly define absolute requirements and optional considerations that could enhance proposals. Additionally, in the Importance and Applicability section, it is unclear whether the 50-year timeline criteria is only related to land conservation and easement projects, or whether proposed projects should also include 50-year projections of emissions reduction or climate resilience benefits.
15. We recommend including technical considerations for climate adaptation and resilience benefits in addition to GHG emissions reduction in the Technical/Scientific Merit section.
16. We recommend expanding the Community/Stakeholder Support section to include low-income and other under-resourced communities rather than “disadvantaged communities” defined by the CalEnviroScreen tool.

4.3 Grant Agreement

17. We recommend including timing of landowner agreements in the full application to avoid grants being awarded to projects that are not feasible.

Thank you for your leadership on this important issue. We welcome the opportunity to discuss any of our comments further and look forward to working with the Board to invest in California’s natural and working lands.

Sincerely,



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Action & Sustainability*



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