

February 8, 2019

California Natural Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

RE: Draft Regional Forest and Fire Capacity Program Grant Guidelines

Dear California Natural Resources Agency Staff:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments on the Draft Regional Forest and Fire Capacity Program Grant Guidelines (Guidelines).

ARCCA is a robust network of regional climate collaboratives – each encompassing a diverse, multi-sector network of agencies and organizations working together to accelerate climate adaptation throughout their region and to catalyze on-the-ground resiliency-building initiatives. As a statewide network, ARCCA brings together thought leaders and practitioners to advocate for equitable and effective adaptation principles and policies, to collaborate towards innovative and holistic solutions, and to build a culture of prioritizing climate and community resiliency. Our member regional collaboratives represent the following regions: North Coast, Sierra Nevada, Capital Region, Bay Area, Central Coast, Los Angeles Region, and San Diego Region. We are actively working to support the formation of regional collaboratives in the San Joaquin Valley and Inland Empire.

We greatly appreciate the thoughtful approach outlined in the Guidelines to increase regional capacity to prioritize, develop, and implement projects that improve forest health and fire resiliency, facilitate GHG emissions reductions, and increase carbon sequestration in forests throughout California. We offer a few comments and recommendations for consideration.

Section 2: Scope of Work

Regional Priority Plans

1. We recommend providing further clarification on the required considerations for Regional Priority Plans. On pages 5-6, the Guidelines currently states that “prioritization should consider, and integrate the following, as appropriate” a list of considerations. This language as written has the effect of indicating applicants may choose not to consider one or more of the listed considerations. Each of the listed considerations are of high priority for local, regional and statewide resilience; as such, applicants should be required to consider each. If

certain considerations are found to be regionally inappropriate, applicants should make the case for why it was not integrated and prioritized relative to other considerations.

2. We support the requirement of developing Regional Priority Plans with broad participation from residents, tribes, government agencies, landowners, and other organizations. A collaborative approach is critical to achieving the program's goals to improve forest health and fire resiliency. In addition to the broad stakeholder engagement described, we suggest including as part of the regional priority planning process conducting regional vulnerability assessments, or integrating existing local vulnerability assessments to establish a regional understanding, to ensure that Regional Priority Plans are grounded in climate science, local/regional data, and community priorities. Conducting a regional vulnerability assessment will enable recipients to map and holistically identify these priority areas for intervention. These assessments should include a comprehensive socioeconomic-environmental analysis to then establish a clear decision-making framework that prioritizes investments and projects appropriately. Cal-Adapt, California's Fourth Climate Change Assessment, the Adaptation Clearinghouse, and other state tools and resources can be leveraged to ensure that this task is conducted in a cost-effective manner, and to integrate and align existing state, regional, and local data.

Project Development and Permitting

3. We suggest clarifying the definition of "no regrets" projects to establish a common definition for all applicants and avoid misinterpretation. Including examples of "no regrets" strategies, as well as demonstration projects, would be helpful additions to the Guidelines.

Award of Subgrants

4. We recommend including universities and research institutions as eligible sub-grant awardees. Many public research institutions and state universities are key partners on research, funding, and project implementation activities, and can also mobilize students to support stakeholder engagement, research, volunteer recruitment, and other activities.

Section 4: Grant Agreement and Administration

Funding and Accounting

5. We suggest elaborating on the terms of a grant agreement that would allow grant recipients to receive advanced payments. Clarity on the conditions of advance payment will allow grant recipients to efficiently plan for and accurately forecast expenses, timeline, and other activities that may require up-front costs versus costs that can be reimbursed.

ARCCA Alliance of Regional Collaboratives for Climate Adaptation

Thank you for your consideration of our comments. We welcome the opportunity to discuss any of our comments further and to provide draft language for consideration. Please do not hesitate to reach out to Julia Kim at jkim@lgc.org or 916-448-1198 x304 if you have any questions or if you would like to schedule a call to discuss our comments further.

We look forward to supporting the implementation of the Plan throughout the state.

Sincerely,



Meg Arnold

Capital Region Climate Readiness
Collaborative



Chris Mertens

Sierra Climate Adaptation & Mitigation
Partnership



Laurel Hunt

The Los Angeles Regional Collaborative
for Climate Action & Sustainability



Phil Gibbons

San Diego Regional Climate Collaborative



Tiffany Wise-West

Central Coast Climate Collaborative



Bruce Riordan

Bay Area Climate Adaptation Network



Kate Meis

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