November 22, 2019

Chair Kathy Castor
House Select Committee on the Climate Crisis
H2-359 Ford Building
Washington, DC 20515

RE: House Select Committee on the Climate Crisis Request for Information

Dear Chair Kathy Castor and Committee Members,

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments in response to the Request for Information from the House Select Committee on the Climate Crisis (Committee).

ARCCA is a California-based network of regional climate collaboratives – each encompassing a diverse, multisector 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 resilience. Our member collaboratives represent the following regions: North Coast, Sierra Nevada, Greater Sacramento Area, San Francisco Bay Area, Central Coast, Los Angeles County, and San Diego County.

We applaud the Committee for recognizing the urgency of addressing climate change and the critical role that the U.S. government needs to play to lead an ambitious transition to clean energy and resilience while achieving important equity and economic development objectives. We appreciate the Committee’s efforts to gather additional input from a broad range of stakeholders from across the country.

We offer a few comments in response to the Committee’s Request for Information, which align with ARCCA’s Guiding Principles for effective and equitable adaptation to mitigate, prepare for, and recover from the impacts of climate change. Our comments are intended to provide high-level recommendations and reflect the diversity of California’s regions and their priorities. While our network includes over 250 individual public agencies, organizations, businesses, and academic institutions from across California, the comments provided in this letter are not necessarily endorsed by each of our individual members.
Cross-Cutting Policies: Innovation (#5)

Congress should focus on the intersection of equity and climate action, focusing on how to protect vulnerable and under-served communities from climate change while also providing social and economic benefits to communities. Potential areas for investment include upgrading and renovating public housing to become energy-efficient and resilient to climate impacts, such as extreme heat, flooding, and wildfires, following standards such as the Living Building Challenge; bringing the California Strategic Growth Council’s Transformative Climate Communities model of development to Promise Zones and Opportunity Zones; and scaling effective neighborhood-scale resilience projects around the US.

Invest in social innovation and behavior change in order to facilitate the cultural and behavioral shifts needed to address climate change effectively. We need not only technological solutions but also changes in how communities and our day-to-day lives are organized. Research and innovation in changes to school and work schedules, work days, commute and mobility options, local government planning processes, community design, and more can help facilitate carbon reductions while improving quality of life and adapting to the impacts communities are already facing.

Community development, including community and building planning, construction, redevelopment and renovation, must progress rapidly to regenerative design principles, ensuring that new buildings and communities are designed to have a positive impact on the health and well-being of residents as well as the environment. The climate and pollution damages inherent in conventional building techniques can be reversed to the benefit of local economies for safe materials and food, local renewable electricity generation and water supplies. The frameworks of the Living Building Challenge and the Living Community Challenge – programs developed by the International Living Future Institute – are a pathway to achieving regenerative practice. Elevating awareness of these programs with funding to support Living Future deployment centers in each state can accelerate progress and shift market standards to a far higher level of ambition and integration.

Agriculture (#7)

The agricultural sector is a critical partner in delivering GHG reductions and sequestering carbon in the land base. New policy is needed to protect agricultural land from development (which can increase emissions per acre by 50-70%) and to develop ‘Climate Smart Farms’ which save water and energy, protect at-risk agricultural lands, increase carbon sinks in agricultural soils and reduce potent methane emissions from dairies and livestock operations. Efforts should also be made to promote the products of such farms in local, regional, national and global markets, where appropriate, differentiating them from conventional farming practices in a meaningful, understandable way. USDA Natural Resources Conservation Service should create new funding programs and strengthen investment in existing
programs to support the development of Carbon Farm Plans and research and engagement to discover and share best practices.

Resilience and Adaptation (#11)

Congress should prioritize policies that support the resilience of the most vulnerable communities first and foremost, as well as key natural and built infrastructure that are critical to building resilience. A just and equitable response requires Congressional leaders to ensure that the people and communities who are least culpable in the warming of the planet and most vulnerable to the impacts of climate change, do not suffer disproportionately as a result of historical injustice and disinvestment. A key resource to prioritize to secure water supplies include the forested headwaters that are currently under threat from wildfires, drought, extreme heat, and insects and diseases leading to tree mortality, such as the Sierra Nevada watershed. Other key resources that should be prioritized include food systems, energy and communications infrastructure, and transportation infrastructure.

Congress should recognize all federal agencies, including the US Army Corps of Engineers, as a federal agency managing lands in good neighbor policies regarding forest health and forest management. Currently, these policies are restrictive to a few federal agencies (such as USFS) and do not include the Corps managed recreation areas. These wildland fire-prone recreation areas surrounding lakes serve as flood protection and water supply, and source water protection is paramount to climate adaptation.

Given the considerable variance in local climate change impacts based on geography, as well as varying levels of community capacity to respond, most climate adaptation and resilience planning must be done at the local or regional scales. However, most local and regional government agencies do not have the resources to undertake climate adaptation planning, let alone more costly implementation of solutions to address sea level rise, wildfires, drought and heatwaves. Within this context, we suggest the following resources be provided by federal and state authorities to enable robust local action to protect human health, critical infrastructure and natural systems.

- Dedicated funding for local and regional adaptation planning. We can’t expect comprehensive planning across all cities and counties if we “nickel and dime” our way forward with today’s very limited pool of one-time grants. This is a serious equity issue in California as wealthier cities can afford to conduct adaptation planning while smaller and poorer communities are left unprotected.

- All communities need information and expert guidance to conduct adequate planning and begin to implement adaptation strategies. Climate Services, modeled on the century-old agricultural extension services program, would provide expert support for local governments through one-on-one consulting, networking and referrals, and group workshops. Climate Services specialists would bring information and best practices to cities and collect great ideas and success stories to
disseminate to the larger group. This type of program would greatly leverage federal, state and local investments in adaptation planning.

- State and county health departments also have a major role to play in climate adaptation and resilience planning as climate change holds serious health impacts from heatwaves, drought, vectors, flooding, wildfires and more. Moreover, these health workers often have already constructed critical networks in their communities to reach and support frontline (often referred to as “vulnerable”) populations. Climate change will exacerbate many existing health conditions which is why leading health organizations globally are naming climate change as the biggest health emergency of the 21st century.

- The federal government should work with state and regional agencies to streamline permitting for climate smart projects. The bottlenecks from multiple permitting bodies threatens to delay projects for sea level rise and flooding until it will be too late to save and support valuable wetlands. The SF Bay Restoration Regulatory Integration Team has the potential to serve as model for the entire country.

- Regions across the country funding and assistance in harnessing the immense power of our 21st century communications networks for saving lives and property during wildfires, floods and other disasters. A true public/private partnership should be formed to bring the power of social media to emergency communications, particularly with vulnerable communities.

**Resilience and Adaptation (#11a)**

In regards to adjustments to federal disaster policies Congress should consider, we recommend expanding pre-disaster mitigation policies, funding and other resources and programs to better support both federal and local response efforts. Many of FEMA’s resources in the past have been responsive rather than mitigative. Expanding existing and new disaster mitigation resources through FEMA, and improving their accessibility for smaller and rural organizations and communities, will help communities implement adaptive projects at the local levels.

Consider incentivizing, supporting or requiring managed retreat feasibility studies and support programs for the most vulnerable areas, i.e. places like New Orleans, Louisiana or Paradise in California. Many areas of the United States will face inordinate risk for the foreseeable future; for example, some populated areas of the coast may be completely lost. Rather than continuing to build and rebuild in these areas, resources should be dedicated for transitioning communities and infrastructure to new locations preemptively.

Consider policies and programs that achieve multi-benefit outcomes in addition to risk mitigation. For example, climate adaptation in rural forested regions is best advanced when recognizing that driving workforce development resources and funding into rural communities will increase the capacity for these communities to implement forest management solutions. Increasing rural workforce capacity in the
forestry sector thus has multiple benefits: local jobs, local economic capital influx, improved ecological health, improved resilience to climate impacts like wildfire and drought, improved drinking water quality and supply, improved carbon sequestration, and more.

Create or expand policies that support cross-sector and cross-agency collaborative coordination, planning and implementation efforts, such as regional climate collaboratives. Collaborative responses enable planning and investment that leverages match funding and resources from multiple entities and crosses jurisdictional boundaries for more effective disaster mitigation and response.

Identify policy changes that incentivize local, distributed, renewable energy and storage to shift energy systems to be more independent, redundant, and resilient. Renewable energy, microgrids, and distributed energy when implemented together in communities reduces reliance on energy sources that are often distant and at risk to climate impacts. For instance, California’s public utilities are shutting off power for millions of Californians because of the widespread risk to utility infrastructure posed by extreme weather events and increased wildfire risk (exacerbated by climate change). Localized energy systems allow local control, reduce reliance on long stretches of vulnerable power lines, and can facilitate more efficient use of local energy sources.

Resilience and Adaptation (#11b)

In order to better identify and reduce climate risks for frontline communities, we recommend greater support or mandates for regionally downscaled scientific assessments of climate impacts. California’s 4th Climate Change Assessment uses a regional break-down of climate impacts, which allows regions to collaborate and share resources to take action on shared impacts in lieu of a one-size-fits-all approach. As climate change effects often vary by region and geography, organizing response through a regional approach will coalesce existing organizations, governments, and funding based on shared geographies and impacts, reduce redundancy, and ensure more efficient, regionally specific response.

Support or mandate context-specific, triple-bottom-line climate vulnerability assessments. Expand or create resources and incentives for state, local and regional agencies to identify the most vulnerable populations, natural resources, economic assets, built infrastructure, and cultural resources to prioritize for local and federal disaster mitigation resources. Ensure that resources for vulnerability assessments incentivize triple-bottom-line approaches to analyzing impacts, or “5 capitals” analysis approaches. Ensure that vulnerability assessments include community engagement from structurally disempowered, historically disadvantaged, oppressed, and low-income populations.

Community-based organizations, especially those from frontline communities, including people of color, immigrants, low income individuals, people with disabilities, those in rural areas, indigenous people and elderly populations who experience compounded and disproportionate social, economic and environmental impacts as a result of climate change, are critically-important leaders and stakeholders in
local and regional adaptation planning. However, these groups are often unable to participate due to a lack of funding and resources. The federal and state bodies should provide funding directly to targeted CBOs so they can play a major role in community-based strategy development and implementation.

Address underlying structural disempowerment and racial discrimination in existing government. Work with social justice organizations to identify policies, programs, structures, and attitudes within government institutions that perpetuate discrimination and injustice, and modify, remove or replace these with empowering, social equity-enforcing substitutes.

Address one of the root causes of climate vulnerability by prioritizing resources for lifting populations out of poverty, inequity, and environmental pollution. Populations that are already economically stable with access to the opportunities needed to thrive, especially access to clean water, food and nutrition, mental health resources, clean air, and jobs will be more resilient to the impacts of climate change.

Prioritize resources and supportive policies for mental health, social cohesion, and psycho-social trauma mitigation and response. Individuals and communities with strong social relationships and strong mental health will be able to respond more quickly and effectively and are more likely to be resilient in the face of both moderate and extreme changes to their communities due to a changing climate.

Prioritize resources and policies to incentivize context-specific uses of green infrastructure to reduce climate risks like flooding and extreme heat and sequester carbon. Use of bioswales, urban forests, green roofs, parks, food gardens, and other green infrastructure can absorb floodwater, reduce the urban heat-island effect, sequester carbon, improve mental and physical health, improve food security, and improve air quality.

Create or expand policies and resources for community resilience centers. Central or communal buildings, such as schools, recreation centers, parks, or hospitals can be retrofitted to be resilient in the face of weather events and natural disasters. For instance, a school can be modified to double as a clean air center during wildfire smoke pollution events, and energy backup hub during power outages, emergency response center and/or shelter in the event of flooding, storm events and wildfire, and serve as a communications hub.

Incorporate policies and recommendations from other model climate adaptation strategies, such as California’s Safeguarding California: 2018 update. The following broader policy goals are examples adapted from Safeguarding’s Climate Justice chapter, which are supported by over 100 specific strategies and policies.

- Actively engage, educate, and partner with communities to enable early, continuous, and meaningful participation in adaptation initiatives.
Identify the most vulnerable communities to climate change to prioritize initiatives and build grassroots capacity.

Support and coordinate adaptation efforts across jurisdictions and policy areas to maximize community resilience.

Promote holistic approaches to climate adaptation that maximize co-benefits and economic development.

Make equity an integral consideration for climate research.

Resilience and Adaptation (#11c)

While there are various standards and codes designed for sustainability and greenhouse gas reductions in mind, there are still few standards and codes focused on climate resilience. This is likely due to the localized nature of climate impacts and their geographic specificity. The International Living Future Institute’s Living Building and Living Community Challenges can provide a good starting place, however, as it requires buildings to be not only low-impact but also help to generate its own energy, air, and food. The passivhaus standard can also help buildings to minimize energy use while keeping occupants safe and comfortable at a range of temperatures.

Climate Information Support (#12)

Congress should continue to support the development of actionable science and localized assessments and data to enable states, regional, and local jurisdictions to undertake science-informed actions to build resilience and reduce climate impacts. Efforts such as the Obama Administration’s Climate Data Initiative should be expanded and enhanced.

International (#13)

Pass legislation to phase out hydrofluorocarbons and other fluorinated gases in line with the goals of the Kigali Amendment to the Montreal Protocol, and participate in other global efforts to reduce short-lived climate pollutants. Used in air-conditioning and refrigeration, hydrofluorocarbons have global warming impacts up to thousands of times greater than that of carbon dioxide and are the fastest-growing GHG emissions today, especially as air-conditioning demand grows globally in response to the climate crisis. Ready-made alternatives to hydrofluorocarbons already exist, from which US companies are well positioned to benefit. According to US air-conditioning industry and trade groups, the Kigali amendment could increase US manufacturing jobs by 33,000, increase US exports by $5 billion, and reduce imports by nearly $7 billion. A coordinated global effort to reduce hydrofluorocarbons could help the world avoid up to a half-degree Celsius in warming.
Congress should also require that the US participate in global efforts to reduce deforestation in tropical countries, through the United Nations or through trade deals. For example, Congress could ban the import of products that are linked to deforestation.

Thank you for the opportunity to respond to the Committee’s Request for Information. We appreciate the Committee’s consideration of our comments and welcome the opportunity for further discussion. Please do not hesitate to reach out to Julia Kim, ARCCA’s Coordinator, at jkim@lgc.org or 916-448-1198 x304 if you have any questions.

Sincerely,

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