



ARCCA

Alliance of Regional Collaboratives
for Climate Adaptation

January 10, 2020

Derek Lambeth
ESC, Hazard Mitigation Planning Division
California Governor's Office of Emergency Services
3650 Schriever Avenue
Mather, CA 95655

RE: California Adaptation Planning Guide, November 2019 Public Review Draft

Dear Mr. Lambeth and CalOES Staff,

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments in response to the November 2019 Public Review Draft of the California Adaptation Planning Guide (Draft APG).

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 offer these comments in response to the Draft APG, 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.

- 1. We appreciate the inclusion of ARCCA and regional climate collaboratives as existing resources for local and regional agencies. We recommend the following changes for accuracy and to provide additional context.**



CAPITAL REGION
CLIMATE READINESS
COLLABORATIVE



- a. The North Coast Resource Partnership formed in 2004.
- b. The “San Francisco Bay Area Climate Adaptation Network” should be changed to “Bay Area Climate Adaptation Network.”
- c. The [Inland Southern California Climate Collaborative \(ISC3\)](#) is a new regional climate collaborative encompassing Riverside, San Bernardino, and Imperial counties, which will be launching this month.
- d. There are additional county-level or multi-county climate collaboratives that have formed or are in the process of forming. We recommend updating draft language to recognize that there are “at least” nine that have formed (including ISC3).
- e. ARCCA developed a [Regional Adaptation Collaborative Formation Toolkit](#) to support local and regional stakeholders in forming a collaborative in regions that currently lack such infrastructure. It may be helpful to include a link to this toolkit so that it is readily accessible for audience members who may be interested in forming a collaborative.
- f. In addition to the activities listed, all collaboratives also provide opportunities for members to exchange knowledge, share best practices, build adaptation-related skills, and help define adaptation priorities for the region.
- g. We encourage highlighting how participation in regional collaboratives and ARCCA supports agencies and staff with limited capacity. For example, the San Diego Regional Climate Collaborative was awarded a NOAA Regional Coastal Resilience Grant in 2016 for helping its members plan for sea level rise, develop scientific, legal, and economic resources regarding coastal resiliency, and perform education and outreach. The resources, tools, and support that collaboratives provide can help to streamline many aspects of the planning process, including data collection and research, identification of adaptation strategies, coordination with neighboring jurisdictions, and community engagement, which can deliver cost savings for resource-constrained agencies.

2. We recommend elevating the importance of and need for regional collaboration in order to leverage limited resources, avoid maladaptation, and promote landscape-level solutions.

- a. Adaptation planning must focus on “systems thinking” in order to prepare and plan for the comprehensive solutions needed to address the cross-sector, landscape-level impacts that communities are already facing. A regional approach should not be limited to local governments, regional planning agencies, tribal governments, and community-based organizations, but should also include special districts such as ports, utilities, and water management agencies, as well as academia, state agencies, regulatory authorities, and private businesses. All of these entities play an important role in shaping community resilience and should be engaged as part of the adaptation planning process.

4. We recommend elevating innovative approaches and providing clearer guidance on the more advanced aspects of the adaptation planning process.

- a. We support the inclusion of Adaptation Pathways as part of the Draft APG and recommend discussing this approach in greater detail in the Guide, rather than in the appendix. Several local jurisdictions are already utilizing the Adaptation Pathways approach, such as the City of Santa Cruz. Many additional jurisdictions are exploring this approach but would benefit from additional guidance to support their efforts, such as sample triggers.
- b. Adaptation planning has come a long way in California over the past decade. While many jurisdictions are familiar with how to conduct vulnerability assessments, which is supported by numerous available resources, tools, and guidance, there are several aspects of adaptation planning that are still very nascent. This includes financing, implementation, monitoring, and adjusting, and further guidance should be provided to make the APG useful. For example, it would be helpful for the APG to discuss the kinds of monitoring that can be done, indicators for change, how to collect data on progress, and how to define performance metrics. One resource that you may find valuable is the Thames Estuary 2100 Plan, which provides a good example of managing flood risk and 10 indicators for change that span environmental, demographic, economic, and social indicators, as well as infrastructure performance criteria.
- c. We recommend strengthening the discussion around financing adaptation strategies. This represents a significant challenge that agencies throughout California face, and the APG should help local agencies understand existing opportunities that can be leveraged. The recently published book authored by Jesse M. Keenan, "Climate Adaptation Finance and Investment in California," should be referenced and highlighted as a source to better understand financing. Furthermore, planning for financing should also be associated with Phase 3.
- d. As the adaptation field continues to mature and evolve, new approaches, tools, and technologies will emerge and become more readily available. However, local jurisdictions often face barriers to pursuing innovative and novel solutions, which hinders their ability to take full advantage of the suite of tools and technologies towards the achievement of their adaptation goals. The APG should provide guidance on how agencies can pilot novel adaptation solutions, navigate potential legal challenges, and assess the efficacy of new tools.
- e. We recommend expanding the discussion on the Housing Element (pg. 124) to highlight how our housing stock and availability will continue to be significantly impacted by climate change, particularly sea level rise and wildfires. More specific guidance should be provided around increasing density in areas that have multiple egress routes and increasing infill development and decreasing single family zoning in order to discourage further development in the Wildland-Urban Interface. Additional recommendations for managed retreat should

also be included. While this is partially covered in Appendix C, this issue demands greater attention throughout the APG.

5. We recommend making the APG as accessible as possible for the intended audience.

- a. Given the staff capacity constraints of many if not all agencies throughout California, the current format of the APG is rather lengthy and difficult to navigate. In order to reach a broad audience, we suggest creating a more streamlined, public-friendly version of the APG for time-constrained agency staff, such as a 20-page overview of the adaptation planning process and key takeaways.
- b. We suggest reconsidering how the wealth of information and resources presented in the appendix can be structured to be more easily navigated. A sortable version of the matrix of adaptation strategies would be incredibly useful for planning agencies so that strategies can be sorted by climate hazard, category, sector overlap, or responsible agencies based on their needs.

Thank you for the opportunity to provide comments to inform the development of the California Adaptation Planning Guide. We appreciate your 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,



Phil Gibbons

San Diego Regional Climate Collaborative



Meg Arnold

Capital Region Climate Readiness Collaborative



Tiffany Wise-West

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Bay Area Climate Adaptation Network



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