



ARCCA

Alliance of Regional Collaboratives
for Climate Adaptation

March 31, 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, March 2020 Final 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 March 2020 Final Public Review Draft of the California Adaptation Planning Guide (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.

Overall, we are pleased to see many of our comments from our [previous comment letter](#) incorporated into the March 2020 draft and appreciate your ongoing efforts to make this guide as valuable as possible to adaptation practitioners throughout California. We look forward to working with CalOES to disseminate the final APG as a helpful resource to assist communities undertaking adaptation planning efforts.

We offer a few additional comments to support the finalization of the 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



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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. The APG seems to focus on local governments and community-based organizations, but should also be inclusive of businesses that are increasingly evaluating climate risks. Further discussion or examples of how the private sector may lend itself to climate adaptation will be helpful. The APG can draw from many examples around the State where incubator programs are creating partnerships between the public and private sector to test and evaluate innovative solutions, such as [Port of San Diego's Aquaculture and Blue Tech Program](#).
2. The "Holistic Approach" section on page 38 speaks of systems-wide, integrated resilience; however, it fails to mention the importance of collaborating on a regional scale when possible. Holistic approaches need to consider not only the community or jurisdiction that the plan is for, but also the area's impact on surrounding jurisdictions and systems. Regional collaboration can help to avoid maladaptation and unnecessary or inefficient duplication of efforts, enabling limited resources to be leveraged for maximum impact.
3. The guidance provided on page 124 related to planning events should address common barriers to participation among marginalized populations. Providing childcare services, ensuring accessibility for people of all abilities, and providing assistive technologies are just a few examples of additional guidance that should be included.
4. Phase 4 of the APG, which is currently the shortest section of the guide, should be further developed as many jurisdictions are poised for implementation but face many constraints and would benefit from more comprehensive guidance. Some of the greatest constraints that jurisdictions face include significant financial barriers, lack of political will, and absence of proofs of concept. The APG should describe notable funding and financing mechanisms in greater detail, such as Measure AA and Blue Forest Conservation's Forest Resilience Bond, and point to the many examples of implementation projects that have been completed or are underway throughout the state.

Clearer guidance for monitoring and evaluation is also needed. As monitoring programs are often resource-intensive, the discussion regarding monitoring should attempt to diminish fears and leverage existing programs or processes. For example, public works departments often conduct routine inspections of the condition of infrastructure and environmental departments may regularly gather relevant data. These data points and operational processes can be leveraged to establish baseline conditions for future comparative analyses and create a streamlined, cost-effective monitoring program.

5. Finally, ARCCA is misspelled as "ARRCA" on page 44.



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, ARCCA 2020 Chair

San Diego Regional Climate Collaborative

Simone Cordery-Cotter, ARCCA 2020 Vice Chair

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Capital Region Climate Readiness Collaborative

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