



# ARCCA

Alliance of Regional Collaboratives  
for Climate Adaptation

November 17, 2021

Secretary Wade Crowfoot  
California Natural Resources Agency  
715 P Street  
Sacramento, CA 95814

Director Samuel Assefa  
Governor's Office of Planning and Research  
1400 Tenth Street  
Sacramento, CA 95814

## **RE: Draft 2021 California Climate Adaptation Strategy**

Dear Secretary Wade Crowfoot, Director Samuel Assefa, and OPR ICARP Staff:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments in response to the Draft 2021 California Climate Adaptation Strategy (Strategy).

[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. ARCCA is a coalition program of the Local Government Commission (LGC), a 501(c)3 nonprofit working to create livable communities throughout California by advancing policies, connecting leaders, and implementing solutions.

In order for the Strategy to be effective and produce the State's desired outcomes, it must reflect local and regional adaptation needs, equitable adaptation practices, best available science, and adaptation priorities and strategies that appropriately meet the scale and pace of the climate crisis. The Strategy should outline a coordinated approach that acknowledges and addresses different climate risks, vulnerabilities, and opportunities experienced throughout the state, as well as the unique assets,



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COLLABORATIVE



strengths, and capacities of California’s diverse regions and communities. With these considerations in mind, we offer a few comments to support the finalization of the Draft Strategy. Our comments are intended to provide high-level recommendations and reflect the diversity of California’s regions and their priorities, as well as the diverse needs and perspectives of local adaptation practitioners. While our network includes over 300 individual public agencies, organizations, businesses, and academic institutions from across the state, the comments provided in this letter are not necessarily endorsed by each of our individual members.

## Overarching Comments

First, we would like to thank you and your team, as well as the numerous other collaborating State agencies, for developing the Draft 2021 California Climate Adaptation Strategy. New levels of collaboration and investment will be needed to effectively and equitably adapt to the worsening impacts of climate change, and the State’s Adaptation Strategy will be key to establishing a clear strategic direction and facilitating coordinated, outcomes-oriented action across State agencies. We look forward to partnering with the State and deepening our collaborative efforts to build resilience for all of California’s residents, communities, natural and working lands, built infrastructure, and more.

Many of the actions and success metrics identified lack specificity. We encourage the State to review all draft actions and success metrics to provide additional details, where possible, to establish a clearer path forward and to strengthen accountability measures. Success metrics should also be as quantifiable as possible.

Several actions only focused on coastal issues and sea level rise. While these are important to consider as part of the State’s Adaptation Strategy, climate risks and threats in inland regions must also be given equal consideration.

We are supportive of the State creating a landing page for the State Climate Adaptation Strategy, which can serve as a useful tool for adaptation practitioners across the state to maintain a clear understanding of State activities and opportunities for coordination and mutual support to achieve multi-benefit outcomes. We encourage the State to implement frequent updates to the landing page to ensure that it reflects the latest information, updates, and resources related to advancing the actions identified in the Strategy. We also encourage the State to establish a transparent tracking dashboard to monitor progress towards success metrics.

## Priority I: Strengthen Protections for Climate Vulnerable Communities

Overall, we are very supportive of the goals and actions identified for this priority. Frontline communities are already experiencing the harmful impacts of climate change - often in addition to historic and ongoing inequities that result in significant disparities in health and socio-economic outcomes. We commend the

State for prioritizing frontline communities as recipients of capacity-building investments and technical assistance, identifying actions to build a more culturally competent and inclusive adaptation movement, and uplifting climate resilience strategies that also seek to address systemic inequities. We encourage the State to remain committed to advancing this priority and working in partnership with Environmental Justice leaders to identify and pursue meaningful actions that empower communities to actualize their own visions for climate equity and resilience.

***Goal A, Action 1 (p. 7)***

We recommend reviewing existing grant programs to identify opportunities to make the application process less onerous, which may also require legislative action. There are several funding opportunities currently available for climate resilience, with additional programs funded by the FY21 Climate Resilience Budget that will soon be established. However, existing funds to-date have been difficult to access for many community-based organizations with limited capacity, especially Tribal communities. While we are supportive of capacity-building technical assistance and funding, we recommend a multi-pronged approach that includes lasting structural changes to State grant programs to make current and future grants more accessible.

***Goal A, Action 6 (p. 9)***

We suggest including other national service programs, such as [CivicSpark](#), as resources for enhancing community adaptive capacity. Additional success metrics to consider tracking include the number of community-driven climate adaptation/community resilience plans developed, and the number of actions and strategies identified in community-driven plans that have been implemented.

***Goal A, Action 7 (p. 9)***

We recommend that the State focuses not only on facilitating community input into studies and research here but also developing community-led, community-driven, and co-created studies on climate-related health impacts. Best practices and recommendations from the Strategic Growth Council's Science to Action: Engagement in Research report should be incorporated.

***Goal A, Action 8 (p. 9)***

We recommend updating this action to elevate communities to lead climate resilience efforts in all regions throughout the state, not just in the Bay Area Region. Community involvement and leadership are critical to implementing climate resilience efforts in all of California's regions and as a State Strategy, all regions should be included. If there are regions that lack community capacity to effectively lead climate resilience efforts, the State should provide funding, technical assistance, and leadership development support to enable all communities to play an active role in climate resilience efforts.

**Goal A, Action 9 (p. 10)**

Similar to our comment above, we recommend updating this action to engage communities most likely to be affected by State climate change planning decisions in all regions throughout the state.

**Goal B, Action 3 (p. 11)**

Data collection and tool development should be informed by user needs and real-world utilization in order to ensure that investments in research lead to tangible applications for addressing climate-related health impacts. We recommend including success metrics related to user input gathered to inform research, data collection, and tool development; number of users visiting each tool and/or report; and how the data and tools are informing local adaptation plans and projects, such as references to CDPH data in local adaptation plans, projects, and programs.

We also cannot stress enough the urgency of collecting and reporting heat-related illnesses and fatalities as part of this effort. Heat is the deadliest but most under-funded of our natural disasters, with many of the fatalities occurring in low-income communities and communities of color. The lack of real-time data results in severe undercounting of heat-related fatalities by the State – by up to six times according to a recent [LA Times article](#) – and prevents communities from taking informed, life-saving actions.

**Goal B, Action 4 (p. 11)**

We support this action and encourage forming science-to-action partnerships with ARCCA’s regional collaboratives, each of which include diverse membership networks of cities, counties, CBOs, Tribes, nonprofits, academic institutions and/or private companies. We recommend leveraging the existing relationships, networks, and infrastructure established through ARCCA’s collaboratives to facilitate community-driven research, support the local application of research findings, and monitor and evaluate outcomes; leveraging existing collaboratives can enable both immediate and sustained, long-term action. We also recommend exploring the Fifth Climate Change Assessment to further the goals of this priority.

**Goal C, Action 1 (p. 12)**

We recommend including success metrics for rural communities and communities in the Wildland-Urban Interface throughout California.

**Goal C, Action 4 (p.12-13)**

We recommend that the success metric focus not only on the number of housing elements approved, but the number of housing elements that successfully and holistically incorporates climate adaptation and climate risk mitigation.

**Goal C, Action 7 (pp. 13-24)**

We recommend expanding the success metric to include providing technical assistance to rural and suburban communities, recognizing the unique challenges that these communities face and the importance of promoting active transportation in all regions throughout the state.

***Goal C, Action 12 (p. 15)***

This action is critical, and we encourage the State to expand the metric here beyond the number of plans adopted, and instead, to consider how it can expand implementation and delivery of resources to historically marginalized and under-served communities.

***Goal C, Action 14 (p. 16)***

We recommend strengthening this action to “... ensure that community development projects funded by the Transformative Climate Communities Program clearly demonstrate how climate resilience will be built and sustained.” Infrastructure projects of all sizes and scales should be designed to support climate resilience and State investments, in particular, must be safeguarded against the impacts of climate change. The State should also consider that not all communities, particularly the most underserved communities for which the TCC is designed, may have the capacity or resources to incorporate climate adaptation into their projects and proposals. The State should consider setting aside funding or technical assistance to work with awardees to ensure that the project is fully climate resilient, both to safeguard State investments as well as communities.

**Priority II: Bolster Public Health and Safety in Light of Increasing Climate Risks**

***Goal A, Action 1 (p. 18)***

We are very supportive of this action, particularly for OPR to provide guidance to local communities on SB-379 and SB-1000 compliance. We have heard requests from many local jurisdictions for specific, actionable guidance, and we encourage OPR to engage with local and regional practitioners to identify the most useful forms of guidance and technical assistance. We also encourage highlighting local models, best practices, and sample language that can help other local communities save time and resources.

***Goal A, Action 10 (p. 21)***

We encourage the State to lift up innovative approaches to community resilience based on evaluations of adaptation projects funded to-date, successful demonstration projects that can be scaled, and other promising solutions in order to promote innovation and provide guidance to local communities. There may be opportunities to encourage innovative approaches as part of grant program guidelines; however, we recommend excluding match requirements in order to preserve the accessibility of grant programs by under-resourced communities.

***Goal B, Action 1 (p. 21)***

The current Draft Strategy fails to mention power outages, which have increased in frequency due to more frequent and severe wildfires and extreme heat waves, as well as planned deenergization events to mitigate wildfire risk. Power outages endanger vulnerable energy-dependent people and have cost California billions. This action should also consider the adverse impacts of power outages to communities and include as part of success metrics a reduction in wildfires ignited by energy infrastructure and a

reduction in planned utility deenergization events (as a result of mitigating wildfire risk through other measures).

***Goal B, Action 2 (p. 21)***

We recommend the State recognize and encourage the urgent need to deploy clean local energy resources that can provide electricity for essential functions during grid power outages, prioritizing deployment in frontline communities and vulnerable households. The rapid procurement of diesel-fuel back-up generators has been the primary source of back-up energy among homeowners, businesses, local governments, and utilities, undermining State and local GHG reduction goals and impacting low-income communities already disproportionately burdened by air pollution. The State can leverage the recent and dramatic cost reductions for distributed clean energy and build upon lessons learned from relevant state programs overseen by the CEC and the CPUC to encourage rapid deployment of back-up clean energy technologies in vulnerable communities.

***Goal C, Action 1 (p. 22)***

Farmworkers are among the most impacted by wildfire smoke, yet many employers fail to provide adequate guidance and protection to their workers. Additionally, many farmworkers are reluctant to seek assistance due to immigration status. Actions here should focus on reducing smoke exposure for farmworkers and other outdoor workers, such as by providing outreach and education in appropriate languages, including indigenous languages, through trusted partners. The State should also provide clear guidance to employers on its workplace safety regulations on wildfire smoke (California Code of Regulations, Title 8, section 5141.1). The state should also develop guidance and safety standards for childcare facilities, schools, assisted living facilities, prisons and corrections facilities, and other sites serving vulnerable people.

***Goal C, Action 5 (p. 23)***

This action should also consider efforts to encourage conservation of natural and working lands to preserve floodplains and provide buffers for developed lands. For example, flood protection could be adopted as a metric in the Sustainable Agricultural Lands Conservation grant program or other conservation programs.

***Goal C, Action 8 (p. 24)***

As part of this action, we encourage leveraging state bonds to support smaller, distributed tanks to capture and store water. While large-scale water storage solutions are a necessary component of water resilience, flood protection, and drought preparedness, distributed water solutions should also be encouraged, particularly in smaller and more rural communities throughout the state.

***Goal C (pp. 22-26)***

The lack of a specific action focused on extreme heat is a serious shortcoming. Extreme heat is among the

deadliest of California’s natural disasters—estimated at over 3,900 deaths between 2010 and 2019 ([LA Times](#))—and already affects much of the state’s population. Heat fatalities are overwhelmingly suffered by low-income people and communities of color, whose neighborhoods are already far more vulnerable to extreme heat due to redlining and decades of disinvestment. We understand that the state is developing a separate extreme heat framework but think that the subject of extreme heat is so severe that it should be prioritized in the State Adaptation Strategy as well. Potential actions include updating and implementing recommendations in the California Department of Public Health’s Preparing California for Extreme Heat (2013); developing heat safety guidelines for schools, assisted living facilities, prisons, and childcare facilities; updating heat safety standards for buildings as part of the building code; and providing outreach and guidance to workers and employees on heat safety and California’s [heat safety regulations](#), which should also be expanded to include warehouse workers. Funding, coordination, and capacity building are also necessary for local governments and public health departments to address extreme heat, and solutions beyond cooling centers are urgently needed.

### **Priority III: Build a Climate Resilient Economy**

#### ***Goal A, Action 3 (p. 28)***

We recommend revising this action to include other geographies and regions with tourism-based economies, not just coastal regions. For example, wildfires, wildfire smoke, and decreasing snowpack have significant impact on tourism-dependent communities, including many rural communities, throughout California.

#### ***Goal A, Action 6 (pp. 28-29)***

We strongly support this action, which is critical to mitigating wildfire risk and building wildfire resilience. We encourage the State to engage with ARCCA’s regional collaboratives representing and serving forested regions - Sierra Climate Adaptation & Mitigation Partnership (Sierra CAMP) and North Coast Resource Partnership (NCRP) - to support the successful implementation of this action. Both collaboratives have experience working closely with public and private partners to enhance wildfire resilience.

#### ***Goal B, Action 3 (p. 29)***

We support this action as a very important strategy for the Sierra’s ongoing economic viability. We recommend involving the Sierra Nevada Conservancy as a key agency partner. A potential success metric could be to achieve a more balanced, sustainable level of visitorship year-round.

### **Priority IV: Accelerate Nature-Based Climate Solutions and Strengthen Climate Resilience of Natural Systems**

#### ***Goal A, Action 10 (p. 34)***

We recommend expanding this action to prioritize nature-based solutions beyond coastal areas. Most of

the existing efforts cited for this action are tied to coastal areas and sea level rise adaptation; however, significant investments are needed to increase green space and nature-based solutions in all regions throughout the state.

***Goal A, Action 14 (p. 35)***

We recommend elevating the need to create financial incentives for nature-based solutions, which should include utilizing existing market mechanisms but also exploring new mechanisms. The Adaptation Strategy can draw from Action #137 of the Draft Natural and Working Lands Climate Smart Strategy, “Explore financial incentives for nature based climate solution investments. For example: Incentivize private landowners and local governments to enter into co-management agreements with California Native American tribes; Incentive-based monitoring pilot program for climate smart land managers; and Incentivize urban landowners to undertake climate smart land management actions such as creating urban landscapes that sequester carbon, utilizing drought-resistant and/or native plants, and protecting large, established trees.” Similar to our above comment, this action should also look beyond coastal areas.

***Goal B (pp. 35-37)***

We support the goal of increasing landscape connectivity and establishing climate refugia and recommend including an action focused on improving open space and landscape connectivity in urban areas. Green corridors in urban areas can combat habitat fragmentation while providing needed parks, shade and recreational amenities for people. We recommend CNRA, OPR, and SGC prioritize investments in green corridors to improve urban landscape connectivity.

***Goal C, Action 1 (p. 37)***

We recommend expanding this action to include urban planning more comprehensively, not just transportation planning. We suggest including OPR as a key State agency and establishing a coordinating body to help plan, fund, implement, and maintain multi-benefit natural infrastructure investments.

***Goal C, Action 3 (p. 37)***

This action is very skewed towards coastal areas and fails to recognize important inland watersheds and ecosystems that must be protected and restored. We recommend revising this action to: “Elevate the use of natural infrastructure solutions over others in efforts to protect and restore coastal and inland watersheds and ecosystems.”

***Goal C, Action 4 (p. 38)***

We strongly support this as the most impactful action that can be taken to protect and enhance water supply. We recommend working closely with local governments and nonprofits to ensure the success metric is achieved. Recognizing that the Sierra Nevada provides 60% of California’s water supply and is experiencing a decline in snowpack, this action should be uplifted as one of the State’s highest priorities.

***Goal C, Action 5 (p. 39)***

Nature-based solutions should be integrated into all new infrastructure investments, not just the High-Speed Rail system and other transportation infrastructure. We recommend expanding this action to integrate nature-based solutions in all new infrastructure investments and devising success metrics that account for other types of nature-based solutions.

***Goal D, Action 5 (p. 40)***

We recommend accelerating this high priority action.

**Priority V: Make Decisions Based on the Best Available Climate Science**

***Goal B, Action 1 (pp. 46-47)***

We strongly support this action for a whole-government approach to integrating climate risk into decision making. We recommend revising the success metrics to include other climate impacts and sectors, not just sea level rise and coastal issues. SGC should be included as a key State agency advancing this action, recognizing the original intent of SGC as a coordinating body for state agencies.

***Goal B, Action 9 (p. 50)***

Similar to other comments in this letter, we recommend that technical assistance focuses not only on sea-level rise and updating Local Coastal Programs. Technical assistance should also aim to support greater climate adaptive capacity of inland local governments throughout California and enhance their knowledge and expertise to update programs, plans, and documents.

**Priority VI: Partner and Collaborate to Leverage Resources**

***Goal A, Action 2 (p. 51)***

This action, in particular, should be prioritized in the State's Adaptation Strategy. Water is an important lens to look at adaptation through given that some of the state's most significant climate threats are connected to water - drought, flood, debris flows, and wildfire; and water management is critical to the other two big threats of extreme heat and sea level rise. The Delta directly connects water supply for 25 million Californians and much for the agricultural land in the San Joaquin Valley). Water is also critical to maintaining and expanding urban tree canopy to combat extreme heat. Given how foundational water is to adaptation, effective coordination and alignment of water management and resilience strategies is absolutely critical. This action connects to roughly 25 other specific actions included in the Draft Strategy - and without coordination, these other actions can, at worst, be working at cross purposes and, at best, will have missed opportunities for achieving multiple beneficial outcomes. This recently published research underscores the importance of this action, recognizing that resilience solutions to many if not most threats are already known, but we do not have an organized approach to prioritizing the implementation of those solutions. Devising an organized approach to water management can enable the

State to most efficiently identify the areas where greatest resilience progress are needed and can be made, while also serving as a model for other sectors and resources.

***Goal A, Action 8 (p. 53)***

We suggest a success metric focused on meeting regional and statewide forest treatment goals identified in the Tahoe Forest Action Plan and California Forest and Fire Resilience Action Plan.

***Goal A, Action 10 (p. 53)***

Similar to other comments, this action could be applied in other coastal regions as well as inland regions to increase equity and resilient planning.

***Goal B, Action 4 (p. 55)***

Building public awareness of both climate adaptation as well as sharing stories on solutions and actions is critical. This action should not focus only on coastal communities, but all California communities and all climate impacts.

## **Regional Profiles**

We greatly appreciate the inclusion of regional profiles, which demonstrate the need and importance of taking a regional approach to addressing regional climate challenges. We suggest highlighting how climate impacts in one region can impact other regions. For example, wildfire smoke impacts, increased risk to water supply and quality, and decreased carbon sequestration are affecting the state as a whole. While the importance of the Sierra's upper watersheds to California's water supply was thankfully noted multiple times in the Draft Strategy, the impacts of the wildfire crisis including decreased air quality and reduced carbon sequestration were largely left out. We recommend further highlighting the numerous ways in which climate impacts occurring in the Sierra (and in other regions) will severely limit California's ability to adapt to climate change at a timely pace.

While each region is experiencing the impacts of climate change, not all regions have comparable levels of capacity and resources to advance adaptation solutions. For example, regions including the Sierra Nevada and San Joaquin Valley, among others, often have significantly less capacity for climate planning and implementation than other parts of the state. The Strategy should include region-specific strategies for increasing capacity and buoying efforts in the state's most vulnerable communities.

The Draft Strategy emphasizes opportunities to enhance equity but does not provide demographic information in the regional profiles. Demographics should be addressed in the regional profiles to highlight where investments are needed from an equity perspective.



Thank you for the opportunity to review the Draft 2021 California Climate Adaptation Strategy and provide comments. We greatly appreciate your time in considering our recommendations and your commitment to adapting to the worsening impacts of climate change and building resilience in communities throughout California. Please do not hesitate to reach out to Julia Kim at [jkim@lgc.org](mailto:jkim@lgc.org) if you would like to discuss any of our comments further or if you have any questions.

We look forward to working in partnership with the State and stakeholders across California to support the implementation of the Strategy.

Sincerely,

A handwritten signature in black ink, appearing to read "Rachel Couch".

Rachel Couch  
*ARCCA 2021 Chair*  
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Julia Kim  
*Climate/Energy Program Director; ARCCA Facilitator*  
**Local Government Commission**

