ARCCA

Alliance of Regional Collaboratives for Climate Adaptation

March 15, 2022

Lynn von Koch-Liebert
Executive Director
California Strategic Growth Council
1400 Tenth Street
Sacramento, CA 95814

RE: Regional Climate Collaboratives Program Round 1 Draft Program Guidelines

Dear Lynn von Koch-Liebert and SGC Staff:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments in response to the Regional Climate Collaboratives Program Round 1 Draft Program Guidelines (Draft RCC Guidelines).

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 CivicWell, formerly 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.

We respectfully offer our comments and recommendations to support the finalization of the Draft RCC Guidelines. Our comments are intended to provide high-level recommendations and reflect ARCCA's Guiding Principles, the diversity of California's regions and their priorities, and 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 for developing a comprehensive set of draft guidelines for the new Regional Climate Collaboratives (RCC) program and this opportunity to provide feedback. We recognize the multi-faceted challenge of designing a new program to meet SB-1072 legislative mandates and the ambitious, cross-cutting goals of the RCC program while navigating the existing regional climate collaborative landscape. We commend SGC for rising to this challenge by creating additional opportunities for stakeholders throughout California to engage in and inform the guidelines development process.

We support the overall vision of the RCC program and recognize the need to build the capacity of under-resourced, historically under-funded communities and regions to secure climate funding, develop actionable plans and projects, and facilitate ongoing collaboration. We also recognize the interconnected challenges faced by community leaders and climate practitioners – insufficient capacity and funding to address the growing impacts of climate change that perpetuate long-standing inequities. As new State programs become available, we believe it is important to understand the existing environment that these programs are stepping into, as well as the potential unintended consequences of limited-term funding programs that could leave behind significant resource gaps that further impair local and regional efforts. We respectfully urge SGC to prioritize existing regional collaboration efforts to build upon and invest in existing infrastructure and hard-won successes; to ensure the most efficient use of State dollars by leveraging existing resources and relationships instead of recreating or duplicating these efforts; and to ensure that the RCC program does not inadvertently undermine the ongoing work of existing regional collaboratives – collaboratives that formed organically through stakeholder-driven processes and continue to play critical roles in their regions to coordinate, catalyze, and build capacity for equitable climate resilience solutions.

Section II: Eligible Activities

- **Leverage Existing Efforts:** We support the requirement for RCCs to leverage, complement, and build on existing regional efforts and resources for capacity building and technical assistance when developing and implementing their work plans. Although the State's climate resilience budget package is injecting much-needed resources into climate adaptation coordination, planning, and implementation, climate adaptation work overall remains significantly underfunded. This includes funding to sustain existing and ongoing efforts, as well as funding for new programs and projects that will need to be implemented as the impacts of climate change continue to worsen. We encourage the continued development of the RCC program in a way that avoids reinventing the wheel or duplicating existing efforts. We suggest providing assistance to applicants to connect them with existing regional efforts, an effort that ARCCA would be happy to support.

- **Increase Award Size:** While we recognize the value of Collaboratives conducting the activities described in the Draft RCC Guidelines, there is a glaring mismatch between the required activities and the grant award size. Each activity, considered independently, could easily consume a

significant portion of the project budget, and requiring new Collaboratives to conduct all thirteen activities could jeopardize their ability to conduct any one of these activities effectively, equitably, and comprehensively. Additionally, considering the severe capacity constraints experienced by the existing climate adaptation workforce, additional funding and time would likely be needed to hire new staff or to increase the capacity of existing staff in order to implement the RCC scope of work. We recommend increasing the grant award size to provide the level of funding needed for Collaboratives to implement the required activities.

- **Expand Peer-to Peer Learning:** We are pleased to see the inclusion of Peer-to-Peer Learning as an integral part of the RCC program and believe that peer-to-peer learning among the collaboratives will be an essential element of their long-term success. We propose peer-to-peer learning go beyond the sphere of the collaboratives funded by the RCC program and encourage SGC to facilitate additional peer-to-peer learning between RCCs and other existing regional collaboration efforts, particularly regional efforts that overlap with the geographic footprint of awarded RCCs. We also recommend SGC regularly share program updates, best practices, learnings, and resources with the public to support effective collaboration throughout the state and to further the goals of the RCC program.

Section IV: Region and Project Area Eligibility

- **Clarify Regional Definition:** While we understand the place-based focus of the RCC program, the way in which a "region" can be defined as a minimum of two census tracts can be problematic for several reasons. This definition is counter-productive to existing and ongoing coordination efforts to address landscape-level climate impacts; years upon years of advocacy to elevate the need for regional, landscape-level approaches to climate adaptation could be jeopardized by the introduction of "regions" as small as two census tracts. This could lead to a fragmentation of resources, focus, and efforts, and risk duplication. As additional State programs adopt regional lenses, the RCC program's unique definition of regions could create confusion, as well as challenges for RCC Collaboratives to easily engage with other existing regional efforts. We strongly recommend SGC include a substantive discussion in the Final RCC Guidelines to acknowledge these challenges and considerations. We also recommend SGC provide more defining characteristics for what constitutes "a region" and "a broader region."

    o Furthermore, we would like to point out the potential challenges of maintaining an 8-county maximum as the population size could vary considerably. For example, 8 counties in Southern California could easily have 5 or 6 times the number of individuals within its boundaries than 8 counties in Northern California.

- **Clarify State Alignment:** We were pleased to see the inclusion of the RCC program alongside five other prominent climate adaptation initiatives included in the State's budget, presenting an opportune time to leverage State climate investments for more holistic solutions, more effective coordination, and meaningful progress towards climate resilience. We also appreciate SGC's prior comment that the RCC program could align, to an undetermined degree, with the development

and implementation of the CERF program, in particular. We would like to request SGC provide more information on how the RCC program will be expected to align or interact with other State-funded programs. We would also like to request assurance that regions working to secure multiple funding opportunities would not be penalized, i.e. confirmation that receiving RCC grant funds would not jeopardize awarded regions from pursuing future climate funds or negatively impact the competitiveness of other regional climate grant applications. Sharing such information could help to alleviate regional concerns related to over-tapping community-based organizations and duplicated efforts.

Section V: Eligibility for 'Collective Impact' Collaboratives

- **Increase or Remove Limit:** We appreciate the inclusion of 'Collective Impact' Collaboratives, which recognizes differences in existing capacities and networks across regions, as well as the value of broader regional collaboration for local capacity building. First, it is critical to understand that the existence of a collaborative in a region does not imply that the collaborative has sufficient funding to sustain their work. Regional collaboration has been historically difficult to fund and while it would seem that the RCC program is providing additional resources for regional collaboration, the Draft RCC Guidelines instead prioritizes local collaboration (due to how regions are defined) and creates a competitive environment among existing collaboratives (due to the limit of three 'collective impact' collaboratives). We strongly recommend SGC not set a limit for the number of collective impact collaboratives that will be funded given the immense value that existing regional collaboratives can bring to support RCC program goals – their experiences, existing relationships and social infrastructure, suite of best practices, sustainable management and organizational systems, and potential to serve as a foundational stepping stone for even greater climate equity and adaptation work.

Section VI: Collaborative Stakeholder Structure

- **Provide Additional Guidance for Collaborative Stakeholder Structures:** We appreciate the detail included in this section and support the development of Collaborative Stakeholder Structures as the decision-making bodies of RCCs. As a network of collaboratives, we understand the importance of establishing clear governance structures that uphold trusted, collaborative spaces for group dialogue and decision-making. We also understand that the process of developing collaborative governance procedures can be a time-intensive process that relies upon the trust established between Partners. We offer a few comments to clarify the timeline and requirements of developing Collaborative Stakeholder Structures.

  - We commend and support SGC for recognizing the importance of compensating participants for their time informing and contributing to Collaborative governance, as well as the recognition of "additional training, orientation, and support [often being required] to ensure co-equal participation on behalf of residents and lower-capacity organizations." However, it is unclear how much of the Collaborative Stakeholder Structure should be developed as part of the application process (i.e. uncompensated) or

after awards are made. We recommend clarifying the timeline for developing Collaborative Stakeholder Structures and suggest a phased approach that allows participants to be compensated for their contributions.

- o Underserved community-based organizations are already understaffed and are increasingly asked to participate in committees, working groups, and panels with piecemeal funding for each that rarely add up to fund an ongoing staff position. We strongly recommend reflecting these realities in the Final Guidelines and providing strategies and suggestions for engaging and compensating community partners in ways that can address these challenges.

- o We recommend sharing sample or template governance structures, such as from the Transformative Climate Communities program, particularly, to support applicants representing regions without existing climate-focused coalitions or networks.

- **Support Managing Stakeholders:** We agree that the Managing Stakeholder will serve an important role within Collaboratives and encourage SGC to provide additional support for Managing Stakeholders throughout grant terms. Based on our collective experiences, as established regional climate collaboratives, management-related functions are critical yet potentially time-consuming activities. While existing collaboratives have established effective organizational management systems and trust with their members and partners, newly forming RCC Collaboratives will not have existing infrastructure to lean on (infrastructure specifically designed and developed to serve the Collaborative). While we recognize that management requirements will vary based on the number of Partners, existing relationships/networks, geographic scope, and other factors, the extensive requirements of the RCC program requires an efficient management approach that upholds collaborative governance - an admittedly tough balancing act.

  - o We recommend SGC create and/or source templates, case studies, and/or examples of best practices to share with the Managing Stakeholder to alleviate likely capacity constraints.

  - o We recommend organizing peer-to-peer learning calls specifically for Managing Stakeholders to discuss their approaches, challenges, and solutions with their peers.

Section VIII: Evaluation

- **Fund Statewide Evaluation:** We support the inclusion of ongoing and iterative evaluation to ensure effective project implementation; however, developing metrics, logic models, and evaluation plans can also be a time-consuming and costly endeavor. With consideration to the numerous additional required activities of Collaboratives, as well as the ongoing staff capacity constraints that Collaborative Partners will likely be experiencing when RCC-funded projects launch, we encourage SGC to provide additional support for developing and implementing evaluation plans. If possible, we would recommend hiring an external evaluator to ensure a

consistent approach and methodology across RCCs and to ensure the best use of program budget as this will likely be much more cost-effective than RCCs hiring their own external evaluators.

- o We also encourage SGC to share relevant evaluation findings and results, on an iterative basis, with California's broader community of climate resilience and equity practitioners to expand the impact and reach of the RCC program.

- **Streamline Reporting Requirements:** We strongly recommend SGC provide templates, modifiable samples, and staff support to assist Collaboratives in developing their annual reports (and other required deliverables). We encourage SGC to consider the purpose and utility of the information being requested from each Collaborative to identify opportunities for streamlining reporting requirements and minimizing administrative burdens. For example, SGC could consider hiring an additional staff member to support the evaluation requirements of each Collaborative and be assigned the task of writing a collective annual report for all RCC Collaboratives.

Section XI: Program Thresholds and Scoring Criteria

- **Prioritize Alignment with Existing Efforts:** Building lasting capacity to advance equitable climate solutions takes time; it's an iterative process as some capacity will always be required to build additional capacity. With our current workforce facing severe and growing capacity constraints, it is critical for any new capacity building program to leverage and learn from existing resources, infrastructure, and relationships and apply learnings from past efforts to evolve the practice and generate tangible results. Similarly, building climate resilience is an iterative process that relies on data-driven assessments, comprehensive long-range planning, and coordination across sectors, jurisdictional boundaries, and levels of government. For these reasons, we recommend prioritizing funding for applications that clearly demonstrate alignment with existing efforts to minimize unnecessary and inefficient duplication. We also recommend prioritizing applications that clearly demonstrate active coordination and collaboration with existing regional efforts, which can help to bolster the success of RCC Collaboratives while helping to sustain progress made once the program ends and funding discontinues.

- **Evaluation of Collective Impact Collaboratives:** We reiterate the importance of incorporating pre-existing networks into the new RCC program and recommend that these networks be leveraged to limit duplication and build upon prior successes. At present, however, it is unclear how Collective Impact Collaboratives will be evaluated independently (as compared to a Collaborative application) and if including a pre-existing network as a partner within a Collaborative application would positively or negatively affect the application score. More detail on this process and clearer scoring criteria for Collective Impact Collaboratives would be greatly appreciated.

- **Right-size the Application Process:** Recognizing the severe capacity constraints being experienced across the climate workforce, potential applicants and partners are likely to face similar capacity constraints. As such, it is essential that the application does not require significant upfront investment, at a level that would prevent organizations that could benefit the most from this

program from applying. As such, we recommend that the first phase of the two-phase application process be as light of a lift as possible, prioritizing core application components rather than extensive planning work that would require significant (unpaid) contributions from community organizations. We also request SGC to provide a clearer timeline and additional details on application requirements for each phase and the type of technical assistance that will be provided between phases to ensure that applications are successful.

Thank you for the opportunity to review the Draft RCC Guidelines and provide comments. We greatly appreciate your time in considering our recommendations and your commitment to assisting under-resourced communities to access funding for climate change mitigation and adaptation projects. Please do not hesitate to reach out to Julia Kim at jkim@civicwell.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 SGC to support the successful implementation of the Regional Climate Collaboratives program.

Respectfully,

Darbi Berry, *ARCCA 2022 Chair*

San Diego Regional Climate Collaborative

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