



ARCCA

Alliance of Regional Collaboratives
for Climate Adaptation

October 28, 2022

Integrated Climate Adaptation and Resiliency Program (ICARP)
Governor's Office of Planning and Research (OPR)
1400 Tenth Street Sacramento California 95814

RE: Adaptation Planning Grant Program Round 1 Draft Program Guidelines

Dear OPR Leadership and ICARP Staff:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments in response to the Adaptation Planning Grant Program Round 1 Draft Program Guidelines (Draft APGP 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, Greater Los Angeles, Inland Southern California, and the San Diego Region. 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 APGP 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 adaptation practitioners and community leaders. While our network includes over 300 individual public agencies, nonprofits, community-based organizations, Tribes, businesses, and academic institutions from across the state, the comments provided in this letter are not necessarily endorsed by each of our individual members.



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Overarching Comments

First, we would like to thank OPR and the ICARP team in particular for providing numerous opportunities for stakeholder input throughout the guidelines development process. We recognize the high demand for adaptation planning dollars and the challenge of meeting diverse needs while targeting funding to communities that demonstrate the greatest need. We greatly appreciate your efforts to develop the Draft APGP Guidelines to be as reflective of and responsive to the diverse planning needs of communities throughout California.

The most common concern we heard from ARCCA members throughout the development of this comment letter was the timeline. The proposed timeline for this round presents significant challenges to meeting program goals. The solicitation is scheduled to be released on November 7th with applications due December 16th. This 6-week timeline, which contains several federal holidays, falls on one of the busiest times of the year for eligible applicants as they work to meet year-end deadlines for both projects and internal operations, oftentimes with more limited staff support. The capacity constraints currently faced by local public agencies, Tribes, community-based organizations (CBOs), and nonprofits throughout the state, particularly in communities that stand to benefit the most from the APGP, will likely worsen during this time period and limit their ability to develop robust applications, from developing partnerships and budgets to gathering letters of support. We strongly recommend revising the timeline in light of these considerations and/or adopting a phased application approach.

II. Planning Grant Program

- **Eligible Applicants:** We support the diversity of agencies and organizations eligible to apply to the APGP, allowing for a flexible approach to forming teams that account for the unique context of each locality and organizational ecosystem. We support the requirement of a public entity to be included in proposal teams, recognizing both planning mandates and local authority over land-use decisions, while also allowing applicants that are unable to partner with a public agency to provide a justification and remain eligible. To provide greater flexibility, we recommend explicitly including fiscally-sponsored organizations as eligible entities as many CBOs, including both long-standing and emerging organizations well-suited for partnership, may be discouraged from applying based on the current draft guidelines.
- **Consistency with Existing Plans:** While we agree with the importance of plan alignment, the current draft guidelines, as written, may inadvertently discourage applicants from proposing the types of planning projects that would advance APGP goals depending on the quality of existing plans in their community. In other words, new planning activities should not aim to be consistent with existing plans that include inequitable or

maladaptive policies. Additionally, many of the referenced plans may be under development or revision, which could make it challenging for applicants to demonstrate their proposal's consistency. Furthermore, demonstrating the proposal's consistency with *all* relevant plans could be an incredibly time-consuming effort, especially during the proposed timeframe for application development.

- **Eligible Activities:** We support the wide range of activities eligible for the APGP to allow applicants to determine their own priorities based on their communities' specific planning needs. We encourage the consideration of a more streamlined application process for those proposing targeted planning activities that address specific needs or aim to deliver a set of more narrowly-defined yet actionable results rather than the development of a comprehensive adaptation plan.
- **Ineligible Activities:** We recommend including environmental studies, plans, or documents normally required for project development under the California Environmental Quality Act (CEQA) or National Environmental Policy Act (NEPA) as eligible activities. These planning activities are necessary to develop shovel-ready projects and by making these required activities eligible for funding, the APGP can provide much-needed resources to accelerate implementation. This is particularly important as once-in-a-generation State and federal investments for infrastructure become available to local communities in the near future. Absent dedicated resources to develop Environmental Impact Reports and other documents for CEQA/NEPA compliance, implementation will continue to be delayed in communities that cannot overcome these significant cost barriers.
- **Vulnerable Communities:** We appreciate the flexibility provided in defining vulnerable communities while also calling attention to applicants located in or representing rural communities and tribal lands as priority recipients. We also support the recognition of natural and working lands as a critical yet currently vulnerable sector in the climate adaptation and resilience landscape, and would further add that these lands are critical to building resilience at both the statewide and community scales.
- **Application Components:** We strongly recommend a phased application process, especially if the proposed timeline remains unchanged. The current combination of required application components and the tight timeline will create barriers for under-resourced, under-capacitated communities, the very communities that stand to benefit the most from the APGP. One way to structure a phased application process could be to add a pre-proposal stage as a qualifying round for applicants to then access the full application, which could limit the overall competitiveness of the APGP and help agencies and organizations save precious capacity during this particularly demanding time.

Applicants who are not invited to the full application stage should then be provided with feedback to be better prepared for future APGP rounds or directed to other more relevant grant programs, such as Caltrans' Transportation Adaptation Planning Grant Program or OPR's forthcoming Regional Resilience Grant Program, to name a few.

- **Scoring Criteria (Overall):** While we appreciate the level of flexibility offered by the APGP, the scoring criteria seems to leave too much room for interpretation. The application process will be rather burdensome (if application components and timeline remain unchanged), and the current scoring criteria lacks sufficient detail to help capacity-constrained applicants determine where to focus their limited time. A clearer scoring rubric can serve as a filtering tool to help interested applicants gauge the suitability and competitiveness of their proposal – to inform their decision to apply and guide application development. We encourage translating the criteria, as written, into a clearer scoring rubric – or rubrics if multiple application pathways will be established to enable a more streamlined process for targeted planning activities (as opposed to developing a comprehensive adaptation plan).
- **Scoring Criteria (Project Vision):** We support the prioritization of results-oriented, outcomes-focused planning activities to ensure the APGP's limited planning dollars are spent as effectively as possible during this critical period to prepare for forthcoming implementation dollars.
- **Scoring Criteria (Project Objectives):** Natural and green infrastructure are undoubtedly essential components of climate adaptation and resilience solutions. However, there are a myriad of multi-benefit solutions that can and should be deployed and integrated to advance climate resilience based on the local context. For example, a heat-vulnerable community may decide to prioritize a bus shelter over planting a tree for a number of valid practical or cultural reasons. We recommend revising the fourth project objective to recognize that there are certain cases where engineered solutions could be the preferred option.
- **Scoring Criteria (Community Need and Priorities):** We recommend revising the first consideration to: "What efforts have been made to meaningfully incorporate input from vulnerable communities..." as a way to simultaneously create greater accountability and flexibility.
- **Scoring Criteria (Organizational Capacity):** We recommend including an alternative pathway for applicants that are unable to demonstrate full readiness and capacity by allowing applicants to instead demonstrate how the proposed project is purposefully designed to build the necessary capacity to implement their proposal. Without this

flexibility, only those agencies and organizations that have successfully accessed resources to undertake planning activities in the past will be awarded, creating another grant program that cannot be accessed by our most under-resourced communities that may demonstrate the greatest need for APGP dollars. Furthermore, the inclusion of applicants demonstrating an ability to provide advanced payments to co-applicants as part of the scoring criteria directly favors well-resourced organizations and seems counterproductive to APGP goals, as well as the broader vision and priorities of ICARP and OPR.

- **Program Elements:** Little detail is provided on “community partnership agreements” and conflicting information is reflected in the Draft Guidelines. It is unclear whether community partnership agreements are a required component of the application (as noted in the Scoring Criteria under Community Partnership) or as a project deliverable (as noted under Adaptation Planning Action Plan).
- **Technical Assistance:** We appreciate the systematic approach to designing technical assistance activities and identifying webinar topics to deliver to grantees throughout the program. We encourage a flexible approach to determining topics, as well as the most effective delivery mechanism, following the selection of grantees to ensure technical assistance activities are tailored and meet grantee-defined needs. We would also encourage adding to the list of potential topics, ways in which the comprehensive adaptation planning process itself can be adapted for different purposes with the goal of being practical and leading to real resilience results. For example: how the planning process could be adapted for more rapid project planning sprints to prepare for implementation funding; or how to adapt the recommended 4-phase adaptation planning process to deploy immediate interventions when previously adopted plans or approved projects are no longer aligned with climate resilience objectives.

III. Grant Administration

- **Award Amount:** It is unclear how the different minimum and maximum award amounts have been determined for each entity type. The wide range of eligible planning activities could generate proposals with an equally wide range of resource needs. The Draft Guidelines also encourage multi-sector partnerships and it is unclear how the entity type would be defined if, for example, a proposal with a nonprofit lead applicant includes each of the three entity types as co-applicants.
- **Funding Targets:** We support the prioritization of rural communities in the APGP’s first round of funding. In addition to rural communities being particularly vulnerable to the effects of climate change, as noted in the Draft Guidelines, rural communities also serve

as important stewards of natural resources and investing in their resilience is critical to building resilience throughout the state. We recommend adding further clarification on how rural communities will be defined, as well as how multi-jurisdictional proposals will be categorized, such as those focused on strengthening the urban-rural connection or focused on county-scale planning activities that include a mix of rural, urban, and suburban communities.

While we recognize the need for planning support across all community types, we also appreciate the clear focus of this first round. With numerous ongoing and new grant programs launching, many agencies and organizations are having a difficult time deciding what to and what not to apply for given their limited staff capacity. We encourage ICARP to release funding targets for future rounds with more advanced notice to help organizations prepare. We encourage the consideration of other types of communities for future rounds, such as urban communities or communities with high populations of non-English speakers, immigrants, and/or other vulnerable populations.

- **Match Funding and Cost Sharing:** We appreciate that match funding is not required as part of the APGP. The exclusion of match requirements makes this funding opportunity more accessible to public agencies and community organizations with limited resources. We also appreciate the explicit allowance of APGP funding to be used to provide the required match funding to release other funding or for other grant opportunities.
- **Eligible Costs:** We greatly appreciate the wide range of eligible costs included in the Draft Guidelines, including the flexible approach to covering staff costs, translation and interpretation services to ensure language accessibility, administrative costs to support and sustain operations, and the variety of eligible costs related to engagement, outreach, education, and training. In particular, we appreciate the inclusion of participant compensation as an eligible cost as this will allow for more equitable participation from our most under-resourced and marginalized community members. We applaud OPR and ICARP staff for remaining responsive to stakeholder input and encourage the promotion of the APGP’s approach to match funding and eligible costs to other grantmaking state agencies.

IV. Appendices

- **Appendix B, Glossary and Acronyms:** We suggest including other terms introduced in the APGP Guidelines, such as “community partnership agreement,” as well as clearer definitions of how the APGP defines “rural” for the purpose of the funding target.
- **Appendix F, Work Plan Template:** Section C.3. notes that “all work should end before October 31, 2022,” and may need to be corrected to September 30, 2025.



Thank you for the opportunity to review the Draft APGP Guidelines and provide comments. We greatly appreciate your time in considering our recommendations and look forward to working in partnership with ICARP staff to support the successful implementation of the Adaptation Planning Grant Program. 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.

Respectfully,

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