



ARCCA

Alliance of Regional Collaboratives
for Climate Adaptation

January 27, 2023

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

RE: Community Resilience Centers (CRC) Program Round 1 Draft 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 Community Resilience Centers (CRC) Program Round 1 Draft 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 CRC Program Round 1 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 SGC and the CRC program team, particularly Coral Abbott and Jess McCool, for developing the draft guidelines, conducting robust stakeholder engagement, and providing this opportunity to provide comments. We recognize the multi-faceted challenge of designing a new program to meet legislative mandates and the ambitious, cross-cutting goals of the CRC program while navigating the deeply-entrenched capacity constraints faced by California’s resilience practitioners. We commend SGC for rising to this challenge by creating flexible opportunities for diverse stakeholders throughout California to engage in and inform the guidelines development process.

The bulk of our comments and recommendations focus on revising project requirements and thresholds to align with program objectives. This includes minimizing unfunded work for the agencies and organizations that are best positioned to provide resiliency services for the program’s priority communities. We advocate for minimizing unfunded work as part of the application process to enable historically under-served communities to participate in the program, recognizing the severe capacity constraints that small, rural, and politically diverse communities face in particular. We also found the project requirements and program thresholds in the draft guidelines to be overly prescriptive and rigid, which would be counterproductive to program goals and favor better resourced organizations from accessing the program’s critical funds to establish CRCs. Greater flexibility will attract different types of community facilities and community-serving organizations at different stages of enhancing physical amenities and delivering social programming. We believe a flexible approach is critical to shape a program that remains responsive to diverse needs, strengths, and capabilities and accessible by California’s diverse communities and regions.

III. Implementation Grants

B. Eligibility

- **Expand the List of Eligible Facility Types:** Despite previous and ongoing efforts to establish cooling centers, extreme heat remains among the deadliest climate hazards in California with the most pronounced impacts occurring in low-income communities. Mortality associated with extreme heat has the costliest price tag to the State, conservatively projected at \$50 billion per year by 2050. We commend SGC for prioritizing both physical and social infrastructure to build climate and community resilience, and believe the CRC program should help communities transition away from the traditional, single-solution cooling center model.

We recommend adding art conservatories, parks and open spaces containing informal gathering areas, and recreation centers to the list of eligible facility types. CRCs should support the institutionalization and expansion of services that resonate with communities in familiar and trusted spaces, to ensure that State investments prioritize spaces that will in fact be used and turned to in the hour of need. Many parks and open spaces are well-trusted and well-utilized community facilities that could be adapted to serve CRC functions. Parks may contain recreation

rooms that could be upgraded with design features, such as retractable walls and awnings, to expand the capacity of community-serving spaces.

Additionally, there are pocket parks in many dense, urban areas of the state that communities rely upon for convenient and accessible services during extreme heat events and other emergency situations resulting from or exacerbated by climate change. While these community spaces may not have enclosed buildings, these informal gathering areas could be adapted with amenities like Wi-Fi, mobile device charging stations, community refrigerators and pantries, restroom facilities, emergency equipment rentals and repair services, and a suite of programs to support community resilience.

- **Add Resident-Focused Organizations as Eligible Applicants and Facilities:** In addition to investing in centralized CRCs that provide both physical and social infrastructure for resilience, it is critical to support individuals and households in preparing for climate emergencies. The sheer scale of climate disasters impacting communities throughout the state, coupled with the limited capacity of community facilities and limited amount of funding available through the CRC program, will require Californians to take measures to increase household-level resilience. In some emergencies, individuals would be safer sheltering in place rather than attempting to travel to a CRC. Accessing a CRC may not even be possible in the event of widespread disasters due to compromised transportation infrastructure and routes, or if a CRC reaches its sheltering capacity.

We recommend expanding the list of eligible applicants and facilities to include housing co-operatives, HOAs, neighborhood watch groups, and similar types of organizations that directly reach and serve community residents. These types of neighborhood-based organizations may be best positioned to deliver services and programming to home-bound residents and support resilience building and emergency preparedness at the household level. We also suggest promoting CRC programming that delivers information, resources, and technical assistance related to home hardening against fires, floods, and other climate disasters, as well as tools and trainings to support social cohesion.

- **Ensure CRCs Remain Publicly Available:** For applicants representing the private sector, consultants, and small businesses, we recommend including explicit requirements in the guidelines to prohibit any private, profit-making CRCs from being established. CRCs should remain open to the public without any entrance fees or costs for accessing amenities, services, or programs associated with the CRC.
- **Clarify the Project Area Requirement:** We suggest revising the requirement for Capital Projects to “be within a one-mile radius of the resilience center along a walkable route” to clarify if a one-mile circle radius or a one-mile walk is the program’s intent.

C. Strategies

- **Require Energy Resilience to Ensure Reliability:** In order for CRCs to remain fully functional and reliable when emergencies strike, the facilities themselves must be resilient. Physical upgrades to create climate-responsive buildings and spaces that ensure energy resilience will be critical as the worsening impacts of climate change will bring heightened risk of widespread and prolonged power outages. We believe CRCs should be equipped with backup power generation and storage capabilities, which is currently presented as an optional strategy in the draft guidelines. We recommend reconsidering the optional nature of energy resilience strategies to ensure physical amenities do not fail when emergencies strike.

D. Eligible Activities and Costs

- **Remove Cost Restrictions:** We believe the current cost restrictions in the draft guidelines – Capital Projects (65% minimum), including pre-development (10% cap) and basic infrastructure (10% cap), and Community Resilience Services and Programs (20% cap) – are too prescriptive and misaligned with the program’s intent to support a variety of community-serving facilities. Some projects may encounter significant capital costs for construction and retrofits while other facilities may have been recently upgraded and would benefit from expanding programming related to climate and community resilience. The 10% cap for basic infrastructure can be difficult to meet, particularly for organizations operating out of older buildings in under-resourced areas). Additionally, the 10% cap for pre-development activities may not provide sufficient funds for grantees to complete the required project activities and deliverables, including the Partnership Agreement, CRC Emergency Plan, CRC Year-Round Community Resilience Plan, Progress Reports, Budget Reports, and Close-Out Reports, as well as additional activities including planning, engineering, architectural, and other design work, environmental impact reports and assessments, appraisals, legal expenses, and necessary easements. We recommend removing the specified cost restrictions and instead providing guidance to help applicants balance costs across the defined categories.

We also recommend revising the 10% cap for community engagement and outreach to ensure all projects prioritize community engagement, which is critical to the ultimate success of CRCs. The current 10% cap could be increased, such as to 15%, established as a minimum, or removed entirely to enable a flexible approach, particularly to accommodate projects serving diverse, marginalized, and traditionally “hard-to-reach” communities that may require additional funding for authentic community engagement. This could also support more time-consuming yet worthwhile efforts to meaningfully involve community members in project decisions throughout the grant term.

E. Ineligible Activities and Costs

- **Allow Funding of Ongoing Operational Costs:** The draft guidelines currently require grantees to offer services and programs for a minimum of 10 years and for the facility to serve as a dedicated CRC for a minimum of 30 years. However, grant terms are only for five years. If these requirements remain unchanged, we recommend allowing for ongoing operational costs to be funded beyond the grant term through advanced payments if at all possible. Grantees requesting this allowance could then be required to submit budgets to support their ongoing operational plans for justification.
- **Increase the Indirect Cost Cap:** We believe the 12% indirect cost cap is too low, especially for organizations that have been historically under-resourced and could benefit from additional administrative support. We recommend increasing this cap, such as to 15%, for applicants that demonstrate need in order to attract and enable under-resourced community-based organizations and community-serving facilities to participate in the program.

F. Project Requirements

- **Provide Flexibility to Account for Varying Community- and Site-Specific Needs:** While we appreciate SGC's vision for CRCs to provide a comprehensive suite of amenities and services to support climate and community resiliency, the feasibility of each CRC providing each of the required functions and features is unlikely, particularly for neighborhood-scale facilities as envisioned in the draft guidelines. The current list of project requirements is too robust and demanding for community-based organizations and community-serving facilities that have been historically under-resourced and capacity-constrained. Maintaining these requirements will likely limit the applicant pool drastically and favor larger, more traditional institutions that may not serve as trusted spaces for marginalized populations. This could inadvertently inhibit the establishment of a strong network of life-saving CRCs in the places they are most needed, oftentimes areas with limited social infrastructure that have not been as successful as other regions in securing other sources of State funding. Additionally, the prescriptive nature of these project requirements can prevent CRCs from adequately providing the services of greatest importance to their communities by spreading resources and capacities too thin.

We believe that the expectation for a community organization to meet all of the project requirements without consideration to their local context, such as priority climate risks, identified community needs, and existing amenities and services offered by nearby facilities, is too rigid and would not be reasonable. Additionally, requiring CRCs to provide all of the functions and features listed in the draft guidelines may not be the best use of State funds and limit the number of communities that benefit from this critical program. A more practical and effective approach to providing the comprehensive suite of required CRC functions and features to communities could

be through a networked approach, further described in our later comment, “Allow for Multi-Site Applications.”

We recommend revising the guidelines to enable smaller, trusted, and more accessible CRCs to focus on providing resiliency functions that meet their communities’ own identified needs and climate risks. Allowing communities to self-identify how CRCs can best meet their needs would enable a more tailored, inclusive, and culturally-appropriate approach, which will likely increase the use of CRC facilities during climate emergencies and increase participation in CRC programming. We recommend relaxing the overall project requirements and instead requiring applicants to reasonably justify the functions they propose for their CRC and demonstrate capabilities to respond to the specific climate impacts affecting their community. This approach would be consistent with the guidelines statement that “Specific features, methods, priorities, activities and costs, and Partnerships will vary depending on a specific neighborhood” (p. 5). Furthermore, creating flexible requirements that allow different types of CRCs to be established can promote innovative approaches and generate important learnings that could inform future rounds of the program.

- **Consider Additional Challenges with a One-Size-Fits-All Approach:** In addition to the aforementioned challenges, some sites, particularly in rural areas, do not have broadband access for backup. The requirement for all CRC sites to have the ability to co-shelter pets and provide laundry and shower amenities may also eliminate many potential sites from CRC program participation.
- **Revise Requirement for Hours of Operations:** We support the requirement of CRCs to be able to be activated 24/7 in an emergency, recognizing that requiring round-the-clock operations year-round would be prohibitive for many community and city facilities that have led effective community programming to support social cohesion before, during, and after climate emergencies. It would also be incredibly costly as CRCs will not only be more expensive to operate in terms of staffing and basic infrastructure, but maintenance will be more costly with equipment and amenities needing to be repaired or replaced on a more frequent basis.

To ensure CRCs serve their intended purpose, we recommend requiring CRC facilities to remain open 7 days a week, including during weekends and holidays, for a minimum of a 12-hour period, such as 10 AM to 10 PM to save lives and prevent hospitalizations during an extreme heat event. Extending CRC operations beyond “standard” business hours can enable more community members to access CRC services throughout the year.

- **Provide Definitions for CRC Functions:** We recommend providing definitions for the following required functions of CRCs to provide clarity for both climate-focused organizations that have their own definitions, which may not align with SGC’s intent, and organizations that do not have

direct experience in the mainstream climate field or lack familiarity with emergency management terms.

- Heating centers
 - Cooling centers
 - Clean air centers
 - Hydration stations
 - Weather respite centers
 - Community evacuation and emergency response centers
 - Air filtration system
- **Allow for Multi-Site Applications:** The restriction for each application to only include a single site would be counterproductive to CRC program objectives, particularly for rural, low-income communities. In urban areas, transportation infrastructure and transit routes are denser, providing multiple routes and methods to reach a single center. In rural areas, travel times can reach multiple hours when one road closes and transit options, which are already limited and inaccessible for more remote communities, can be eliminated altogether. During and following the recent atmospheric river storms, many coastal and inland rural regions experienced multiple and shifting isolated areas due to flooding, fallen trees, downed power lines, mudslides, and/or extreme snowfall, making critical roadways impassable. Any one of these incidents could prohibit access to a single site in rural areas with limited transportation routes and emergency responders. A single-site approach could inadvertently increase vulnerability by creating amenities and services that communities come to rely upon, but are inaccessible during times of climate emergencies for both community members and the staff who operate the facility.

A network of dispersed CRCs can provide critical redundancy across services and transportation routes that provide resiliency for multiple hazards. A networked approach could also leverage programming across multiple sites to better support rural communities where CBO infrastructure and capacity is more limited and enable trusted, smaller-scale community assets to serve CRC functions. This approach would also complement the CA Department of Food and Agriculture's own CRC program, which funds larger emergency evacuation and resilience functions.

We recommend amending the guidelines to allow single implementation grant applications to include multiple sites, particularly in rural areas but also in urban areas that serve larger populations. Project Area definitions could be modified to allow applicants to demonstrate how CRC facility requirements would be met by multiple (for example, up to five) CRC sites. In addition to the resiliency and redundancy benefits that a networked approach would provide, this approach could also support joint procurement, shared legal services, shared staff, and additional cost-saving measures. If this amendment is not possible, we recommend citing specific legislative

language that prohibits such an approach, which we were unable to find in the budget bill (AB-197) or the budget trailer bills (AB-211 and SB-155).

- **Clarify 10 Year Requirement:** With grant terms limited to 5 years, and if this requirement remains unchanged, we recommend clarifying how the 10-year minimum for CRC services and programs will be guaranteed. We also recommend State support to help CRCs develop continuity plans, access additional public, private, and philanthropic funding, and establish self-sustaining, community-led financing mechanisms to support ongoing CRC operations.
- **Require Emergency Plan as a Project Deliverable:** The requirement of CRC Emergency Plans as an application component presents a significant barrier for organizations serving each of the program’s priority communities identified in the draft guidelines. Under-resourced communities are unlikely to have the capacity or resources necessary to develop an Emergency Plan. Maintaining this requirement will likely limit the applicant pool and favor communities that have been able to secure the resources and political support to develop such plans, precluding communities that stand to benefit the most from the CRC program from participating.

We recommend requiring grantees to develop a CRC Emergency Plan as a project deliverable and requiring applicants to describe in their proposal narratives their current situation and partnerships around emergency response and how these will be leveraged to develop a comprehensive plan as part of the project. A Draft CRC Emergency Plan could be required within the first year of the project and plan development costs should not be constrained by the draft guidelines’ 10% cap for pre-development activities.

G. Program Thresholds

- **Require Signed Partnership Agreements as a Project Deliverable:** Submitting a signed Partnership Agreement as part of the application process will be difficult for most applicants. Effective and equitable Collaborative Stakeholder Structures and Partnership Agreements take time and capacity to establish; it can be a monumental effort to bring together multiple agencies and organizations to collectively establish agreement terms. Requiring signed agreements during a grant application phase can dissuade organizations from serving as the lead applicant or joining an applicant team, as some organizations may be reluctant to engage in a project with this level of commitment absent a grant award.

The application timeframe will also make it incredibly challenging, if not impossible, for signed Partnership Agreements to be secured. These agreements would need to be signed by an elected body or an executive, and finalized scopes and budgets are often needed in order for an authorized signer to consider reviewing an agreement. Applicants will likely be navigating ongoing capacity constraints while working to complete materials up to the application deadline, which may not provide sufficient time for agreements to be reviewed, finalized, and circulated for

signatures. Some organizations may also have set management and board approval processes and schedules that do not fit within the application timeframe. This is particularly true for cities and counties with set council and board meeting schedules, and many will not be able to sign an MOU prior to being awarded a grant.

We recommend requiring signed Partnership Agreements and MOUs to be submitted as a project deliverable within a specified timeframe, such as prior to the execution of a grant agreement or shortly thereafter. A draft Partnership Agreement with identified signatories could be required as a threshold item for the full application, along with letters of commitment. We also recommend allowing modification to draft agreements to include additional partners so that communities can continue to leverage their community engagement efforts to strengthen CRC partnerships. We also recommend clarifying the lifespan of the Partnership Agreement with consideration to no long-term funding for ongoing operations available to promote and support partnerships beyond the completion of the 5-year grant term.

Furthermore, while the complexity and diversity of the Collaborative Stakeholder Structure required may be ideal, it may be prohibitive for certain communities. For example, the requirements for the CRC program far exceeds that of any forest collaborative in the Sierra Nevada region, many of which have been in existence for years. The time and resources involved in establishing required structures would likely be prohibitive for many groups in rural regions, most of which are very small, extremely capacity-constrained, and under-resourced organizations. Softening these requirements or providing flexibility would increase the accessibility of the CRC program to rural regions facing increased risk of wildfire, wildfire smoke, and extreme heat incidents.

- **Require Site Readiness Materials as Project Deliverables:** The laundry list of requirements for site readiness, including CEQA documentation, site control, project site analysis, permits, financial feasibility, project maps and designs, project schedules, and operations and maintenance plans, to be submitted at the application stage is likely beyond the capacity of agencies and organizations serving the program’s priority communities. This being the first round of funding for a newly established program makes meeting these application requirements particularly challenging. Maintaining these requirements will favor agencies and organizations that are able to access other funding sources, once again putting under-resourced communities at a disadvantage. We recommend requiring each of these site readiness materials to be developed and submitted as a project deliverable within the first year of the grant term.
- **Revise Applicant Capacity Requirements:** We recommend revising the capacity requirements for Lead Applicants and Co-Applicants to enable capacity-constrained organizations to leverage this opportunity to build and institutionalize management and financial capacity. This could also help to broaden lead applicant pools for other State funding opportunities. CRC program guidelines

could provide greater access and flexibility by allowing applicants to demonstrate relevant capabilities rather than existing capacity, identify strategies to ensure that the necessary capacity will be built in the early stages of the grant term, and provide additional references who could speak to their track record.

- **Revise Requirements for the Long-Term Use of CRC Facilities:** We recommend requiring the legally binding document specified in the draft guidelines to be supplied as a project deliverable. Producing a legally binding document for a 30-year term is a difficult requirement to meet, especially without any funding in hand. Additionally, it may be challenging for community organizations to continue providing CRC services after the 5-year grant term comes to a close, particularly if grant funds are used to hire resources that could no longer be retained. This requirement also seems to favor larger, better-resourced organizations. We recommend reducing the 30-year term, clarifying how extended terms will be enforced beyond the grant term, and providing transition support to CRC partners to help bridge the gap between the grant term and ultimate CRC use terms.

H. Application Process and Components

- **Retain the Multi-Phase Application Process:** We support the multi-phase application process that includes an open pre-proposal phase followed by an invite-only full application phase and recommend retaining this process in the final guidelines. We commend SGC staff for structuring the pre-proposal phase as a qualifying round to limit the number of full applications, which will limit the amount of collective time spent developing lengthy applications. However, because the pre-proposal phase will disqualify some applicants from submitting full applications, we recommend establishing a set of scoring criteria for pre-proposals for added transparency and accountability and to provide additional guidance for both applicants and reviewers at this critical stage where make-or-break decisions are made.
- **Right-Size Application Components to Limit Unfunded Work:** In addition to our aforementioned comments regarding what we believe are burdensome requirements for the application phase, particularly for under-resourced and capacity-constrained organizations, we recommend reviewing required application components to limit unfunded work to the extent possible to increase program accessibility and participation.

I. Scoring Criteria

- **Clarify Scoring Criteria:** To enhance the transparency and accountability of program decisions, as well as to provide further guidance to applicants, we recommend clarifying the point-scale for each category. For example, of the 30 possible points for CRC Vision & Objectives, how many points would be given to Project Area, Vision Statement, and CRC Strategies under that category.

J. Grant Administration

- **Reduce Minimum Award Amount:** We believe the minimum grant award of \$5 million for implementation projects is too high and can inadvertently give priority to larger organizations or incentivize high-cost projects. Certain projects will require more than \$5 million in capital costs alone while upgrades to existing trusted neighborhood facilities may fall well below the minimum award level. The CRC program is intended to support a diverse array of facility types and community services that may be at different stages of development and implementation. Some projects will require new construction while others will focus on existing facilities; some facilities may have been recently upgraded while others may require costly upgrades to account for deferred maintenance and new resiliency features; some organizations may need to create new programming while others look to expanding successful programs.

We recommend reducing the minimum award amount to \$1 million and maintaining the current max award level of \$10 million to allow applications to be tailored to meet specific and evolving community needs, promote a cost-effective approach, and allow more communities to benefit from the program. SGC could also consider further reducing the floor, such as to \$200,000, to allow more established CRCs to implement the single or few targeted retrofits that may be needed in order to meet program requirements for facilities. We also recommend considering partnerships with, or applications from, local and regional agencies and organizations that can serve as coordinating entities to coordinate multi-site applications or to provide microgrants to smaller organizations.

- **Streamline Reporting Requirements:** We recommend revising program guidelines to require progress reports on a quarterly or biannual basis to reduce administrative burdens. A less frequent reporting schedule could be supplemented by more informal check-in calls between grantees and SGC where project updates and challenges can be shared more openly.

IV. Planning Grants

In an effort to keep our comment letter streamlined, some of the comments we shared for Implementation Grants that are also relevant to Planning Grants are not fully captured below. We recommend reviewing our prior comments for relevancy and ensuring applicable changes are also made for Planning Grants to establish a consistent approach.

A. CRC Planning Grant Program Objectives

- **Allow for Tailored Planning Activities:** The current guidelines indicate that all proposed planning projects must meet each of the four objectives outlined. We believe planning projects should be required to meet at least one of the first three objectives outlined to enable communities to tailor their projects to their local context and address their communities' specific needs.

B. Eligibility

- **Provide Greater Flexibility for Severely Resource-Constrained Communities:** While we appreciate the strong alignment between planning grant and implementation grant requirements to prepare grantees for implementation funding, we recommend greater flexibility for planning grants to increase overall program accessibility. We support the additional flexibility provided for Collaborative Stakeholder Structures and encourage SGC to consider additional opportunities to ensure program guidelines are not overly burdensome for severely resource-constrained communities, including communities that have not been able to gain buy-in from elected officials or executives to pursue climate-related activities, as well as communities with limited social infrastructure or severely capacity-constrained partners.

For example, some communities may not have the capacity to identify a single CRC site as part of their application and may only be able to fulfill this requirement once funded through a planning grant. Some communities in regions with limited social infrastructure may not have had prior funding or other opportunities to cultivate partnerships to engage the diverse set of partners expected for the Collaborative Stakeholder Structure. Greater flexibility for CRC Planning Grants could enable communities that are unable to access or successfully compete for State funds to build capacity, mobilize partners, and begin advancing their communities' resilience priorities.

C. Eligible Activities & Costs

- **Include Broader CRC Network Planning as an Eligible Activity:** We recommend including planning activities that may not be applicant- or site-specific but could prepare communities and regions for future rounds of CRC funding. We believe it would be highly beneficial for communities to conduct high-level assessments of existing community facilities, amenities, services, and programs, which could be conducted at multiple scales (neighborhood, jurisdiction-wide, multi-jurisdiction, and regional). Such an assessment can provide greater understanding of critical gaps and opportunities that could be addressed and advanced through future CRC program rounds. This and similar types of planning activities could also support the level of community and stakeholder engagement necessary to prepare for implementation grants.

E. Application Process & Components

- **Retain Overall Application Process:** We support the more simplified application process described in the draft guidelines, which we believe will enable more resource-constrained organizations to apply.

G. Grant Administration

- **Reduce Minimum Award Level:** We recommend reducing the minimum award level to \$100,000 to encourage smaller organizations to apply and to enable more communities to benefit from the



program's planning grant stage. With numerous new State climate grant programs launching this year, some applicants may be able to leverage other funded projects that satisfy some CRC planning grant requirements.

Thank you for the opportunity to review the Draft CRC Program Round 1 Guidelines and provide comments. We greatly appreciate your time in considering our recommendations and look forward to working in partnership with SGC staff to support the successful implementation of the CRC 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,

Darbi Berry, *ARCCA 2023 Chair*
San Diego Regional Climate Collaborative

Kaeleigh Reynolds, *ARCCA 2023 Vice Chair*
Sierra Climate Adaptation and Mitigation Partnership

Erin Coultts
Los Angeles Regional Collaborative for Climate Action & Sustainability

Michael McCormick
Bay Area Climate Adaptation Network

Karen Gaffney
North Coast Resource Partnership

Heather Allen
Central Coast Climate Collaborative

Julia Kim
Capital Region Climate Readiness Collaborative / CivicWell (formerly Local Government Commission)



CAPITAL REGION CLIMATE READINESS COLLABORATIVE

