March 3, 2023

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

## RE: Regional Resilience 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 Regional Resilience Planning Grant Program (RRGP) Round 1 Draft Program Guidelines (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.

## Overarching Comments

First, we would like to thank OPR and the RRGP team, particularly Dolores Barajas, for thoughtfully developing this new program and providing numerous opportunities for stakeholder input throughout the guidelines development process. We recognize the high demand for climate resilience planning and implementation 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 Guidelines to be as reflective of and responsive to the diverse planning and implementation needs of communities throughout California.

Overall, we found much of the Draft Guidelines to be in alignment with ARCCA's Guiding Principles, the California Resilience Partnership's Climate Crossroads recommendations for grantmaking improvements, and other comment letters we have submitted to help inform grant guidelines with similar goals to the RRGP. Many of our comments in this letter are in support of what is currently reflected in the Draft Guidelines, supplemented by suggestions to further enhance the program's structure and requirements to best achieve the program's defined goals. We also share a few recommendations intended to increase access, target resources to fill critical gaps that can increase regional readiness and capacity for implementation, and right-size application and program requirements to support immediate and sustained capacity building.

## I. About the RRGP

- **Strengthen Funding Set Aside Goals:** We support the flexibility provided to allow regions to self-identify their geographic boundaries while also ensuring at least one project from each of the nine regions defined by the California Climate Adaptation Strategy benefits from the program. In every region, communities are at very different stages of the overarching climate adaptation and resilience process. To further support regional distribution and to enable both implementation and implementation readiness across California, we suggest establishing a goal of funding at least one planning project and one implementation project in each region, as grant funds allow. This goal could be supported by projects awarded competitively and through the program's set asides.

  We also support the defined funding set asides for applications that benefit "disadvantaged communities," support California Native American Tribes, and projects to establish tribal and rural regional partnerships. The Draft Guidelines allocate at least 25% of grant funds to applications benefitting "disadvantaged communities." We recommend revising the Tribal set aside to also allocate at least 10% of funds to support California Native American Tribes.

## II. Before Applying

- **Support Applicant Eligibility:** We support broad eligibility for public entities, Tribes, and CBOs, particularly fiscally-sponsored organizations, collaboratives, and networks. ARCCA's member regional collaboratives have existing networks, infrastructure, and programs that can be

leveraged and expanded to support RRGP goals. The urgency to build climate resilience and address community needs requires both immediate and sustained action. We believe ARCCA's member regional collaboratives are well-positioned to lead, facilitate, and support regional capacity building, coordination, planning, and implementation and appreciate the opportunity for fiscally-sponsored collaboratives to participate in the RRGP.

- **Support Integration of Capacity Building and Workforce Development:** We support the integration of capacity building and workforce development as eligible activities for both planning and implementation grants. Additional examples of capacity building activities may include establishing or enhancing regional knowledge sharing, coordination, and collaboration infrastructure; engaging and educating elected officials to build political will for climate resilience projects; and providing technical assistance to partners to strengthen both climate-specific skills and broader organizational infrastructure to build capacity over the long-term. Additional examples of workforce development activities may include engaging with labor unions to advance pipelines for climate jobs across key industries; creating or expanding career transition programs to support mid-career professionals to leverage their technical skills (such as in software development, communications, or finance) to join the climate workforce; and integrating climate resilience into existing apprenticeship programs.

  We also support the inclusion of interns, fellows, and other positions that are not on an organization's payroll as eligible direct costs. CivicSpark Fellows and California Climate Action Corps Fellows have provided critical capacity for local and regional agencies, jurisdictions, and organizations to continue advancing climate resilience goals in resource- and capacity-constrained environments. Providing pathways for fellows and emerging professionals to directly engage in RRGP-funded projects can support California in growing the direly-needed climate workforce to accelerate climate resilience efforts for all communities.

- **Include Pre-development as Eligible 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), such as CEQA-certified Climate Action Plans and Environmental Impact Reports, as eligible activities. We also recommend allowing permitting fees and contingency fees as eligible expenses. These pre-development activities are necessary to prepare projects for implementation and by making these required activities eligible for funding, the RRGP can provide much-needed resources to support accelerated implementation.

  Funding pre-development costs is particularly important for this program as once-in-a generation State and federal investments for infrastructure are already becoming available and will accelerate over the coming months and years. Absent dedicated resources to support these necessary activities and costs, implementation will continue to be delayed in communities that cannot overcome these significant cost barriers.

- **Support No Match Requirement:** We appreciate that match funding is not required as part of the RRGP. The exclusion of match requirements makes this funding opportunity more accessible to community organizations and public agencies with limited resources or limited capacity to secure additional funds. We also appreciate the explicit allowance of RRGP funding to be used to provide the required match funding to release other funding or for other grant opportunities.

## III. Preparing and Submitting an Application

- **Provide Regionally-tailored Technical Assistance:** For future rounds of the RRGP, we recommend an approach that assigns third-party technical assistance providers to each region and partnering with collaboratives, organizations, and networks that have familiarity with the key stakeholders, demographics, climate risks, and needs in their assigned region. Ideally, technical assistance providers would be based in their assigned region and have existing relationships, infrastructure, and related ongoing programs that can provide prospective applicants with additional benefits beyond RRGP application support. One model to consider reviewing would be structure for technical assistance for the Community Economic Resilience Fund (CERF) Pilot Projects grants.

- **Refine Scoring Criteria:** To better align scoring criteria with program goals, more weight should be given to Climate Risks and Co-Benefits. We recommend aligning this component with the Community Needs and Priorities component (e.g., 20 total points possible for each) to elevate the importance of both of these critical aspects of climate resilience planning and implementation.

- **Ensure Application Components Create a Level Playing Field:** We commend OPR for streamlining overall application requirements and appreciate the level of guidance provided for each application component and corresponding criteria. The level of detail included provides sufficient guidance while not overwhelming applicants – a difficult balance to strike. As an additional resource to help applicants navigate application requirements, we suggest providing a simplified outline or checklist of all materials and attachments that must be included in each application.

We are also generally supportive of the word limits for each application component that provide sufficient space for applicants to explain their proposed project while not demanding more than what is needed to evaluate applications. However, additional space may be needed for implementation grant applications due to the more complex nature of implementation and higher awards amounts for implementation projects compared to planning projects.

In an effort to ensure that past and current resource constraints do not put any applicants at a disadvantage, we recommend removing any optional attachments as part of the application process including the Community Engagement Plan and the Community Partnership Plan. These plans should instead be required as project deliverables to ensure all grantees develop these plans and have the funds to support intentional development. By including these or any optional attachments as part of the application process, better-resourced organizations that can dedicate additional staff resources to developing applications may be favored over other applicants.

## IV. After Applying

- **Support Sharing Summary of Applications:** We appreciate the added detail and transparency for the application review process. In particular, we appreciate that RRGP staff will be posting a summary of all applications staff received before making funding decisions. This summary can serve as a helpful resource for both Round 1 applicants and prospective applicants for future rounds to connect with partners in their region while also serving as a source of inspiration for other regions working to address similar climate risks or community needs.

## VI. Selected Applications

- **Right-size Program Requirements to Support Capacity Building:** The Draft Guidelines includes terms for fund disbursement and accounting that could create barriers for eligible applicants and be counter-productive to capacity building goals – an important aspect of the RRGP that we fully support. We recommend revising the proposed terms to remove the five percent withholding of grant payments and allowing grantees to request reimbursement on a monthly or bi-monthly basis. We believe these are important changes to support all eligible applicants, particularly for community-based organizations and Tribes, many of which are working on other projects funded through reimbursement-based grants. If left unchanged, these terms could discourage under-resourced organizations serving the program's priority populations from applying and create a greater strain on grantees' existing reserves, divert staff time from project activities to manage cash flow issues, and hinder capacity-building efforts from generating meaningful and lasting outcomes. Recognizing that OPR does not have authority to provide advance payments for the RRGP, we believe all modifiable aspects of the program's grant disbursement terms should be structured to minimize administrative and financial burdens for grantees.

- **Support Program Expectations:** We support requiring project action plans and partnership MOUs as project deliverables rather than as application components, and the streamlined requirements for progress reports. We also support the opportunity for grantees to submit proposals for additional grant funding to procure a technical assistance provider. Extending the timeframe for this opportunity beyond the first quarter of the grant term, particularly for implementation grants, could enable grantees to access technical assistance as the project progresses if any unforeseen challenges arise or if additional technical assistance is needed to overcome barriers.

## VIII. Appendices

- **Provide Additional Resources to Support Applicants:** We appreciate the helpful information provided in the appendices to help prospective applicants understand how examples of eligible planning and implementation projects address different climate impacts, as well as to navigate existing State plans and resources. In addition to providing application templates, we recommend providing samples to demonstrate the level of detail that applicants should provide in their Work Plans and Budgets. This can help applicants navigate ongoing capacity constraints to more

effectively direct limited staff time to meet the expectations of RRGP staff and the interagency review panel for applications.

Thank you for the opportunity to review the Draft RRGP Round 1 Program Guidelines and provide comments. We greatly appreciate your time in considering our recommendations and hope you find our comments to be helpful. 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 OPR and RRGP staff and mobilizing our statewide and regional networks to support the successful implementation of the program.

Respectfully,


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