December 7, 2023

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

RE: Extreme Heat and Community Resilience Grant Round 1 Draft Guidelines

Dear Braden Kay and ICARP Staff:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments in response to the Extreme Heat and Community Resilience Program (EHCRP) Draft Round 1 Grant 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, Inland Southern California, and San Diego County. ARCCA is a coalition program of CivicWell, a 501(c)3 nonprofit working to create livable communities throughout California by advancing policies, connecting leaders, and implementing solutions. ARCCA is also an implementing partner of the California Resilience Partnership.

We respectfully offer our comments and recommendations to support the finalization of the the EHCRP Round 1 Grant Guidelines. Our comments are intended to provide high-level recommendations and reflect ARCCA's Guiding Principles, the California Resilience Partnership's Climate Crossroads Recommendations Report, 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, 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 the ICARP Team, particularly Braden Kay, for your thoughtful approach to developing the Extreme Heat and Community Resilience Program, the State's first grant program explicitly dedicated to addressing extreme heat. We appreciate staff efforts to develop the program based on early and ongoing input from communities and practitioners, including efforts to provide transparency into the development process (e.g., publishing the summary of public comments received). We also support the broad eligibility of both planning and implementation activities, granting applicants with the flexibility of proposing high-impact projects based on their community's unique needs, assets, and priorities. To accelerate and align action on extreme heat, we recommend complementing this program with additional interagency coordination on the Extreme Heat Action Plan (EHAP) as ICARP is well-positioned in the Executive Branch to support and drive state coordination on extreme heat.

We encourage ICARP staff to use this first round of EHCRP funding to demonstrate proof of concept and the efficacious use of State funds in order to protect this highly anticipated and needed program in future State budgets. We recommend ensuring the application process is intentionally designed to enable under-resourced agencies and organizations to participate, recognizing both the chronic and acute capacity constraints being faced by climate practitioners across the state and most severely by under-served and heat-burdened communities. We also recommend waitlisting applications to ensure Round 1 funding is fully encumbered in the event that an awarded applicant is unable to sign a grant agreement.

I. About the Extreme Heat and Community Resilience Program

- **Seek Authorization for Advance Payment:** We strongly recommend allowing for advance payment for future rounds of funding and for this first round if at all possible. If OPR is not authorized to provide advance payments for EHCRP, we suggest providing an explanation in the grant guidelines, especially with respect to the provisions of AB-590 allowing grant-administering state agencies to provide advance payment of up to 25% to nonprofits.

- **Limit Need for Technical Assistance:** We recommend limiting the need for technical assistance during the application phase by making the final guidelines, pre-screening survey, and full application as clear and user-friendly as possible. While technical assistance will be tremendously valuable for some applicants, we also recognize that seeking and receiving technical assistance does require a level of staff capacity that some applicants may not be able to afford. Establishing a streamlined, easy-to-navigate application process can enable applicants to focus their limited time directly on their grant applications. We also recommend providing an FAQ resource for both the pre-screening survey and the full application to provide further guidance throughout the application period.

- **Provide Sufficient Time for Applications**: We recommend providing a minimum of 3 months for the application period to ensure applicants are able to dedicate the appropriate resources needed to develop robust applications while managing competing priorities. We encourage the

ICARP team to be mindful of other grant opportunities that may have similar timelines to the EHCRP to avoid unintentionally worsening capacity constraints during the application period.

II. Applicant Eligibility and Funding Targets

- **Consider Expanding Eligibility:** We support the program's broad eligibility for public entities, Tribes, and CBOs, as well as the explicit eligibility of fiscally-sponsored organizations, collaboratives, and networks. ARCCA's member regional collaboratives, many of which are fiscally-sponsored organizations, have existing networks, infrastructure, and programs that can be leveraged and expanded to support EHCRP goals, which will require 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 that they are eligible to apply for the program.

    We also recommend expanding applicant eligibility include housing authorities, such as public housing authorities and Indian housing authorities, as they are at the forefront of equity issues that arise in extreme climate events. We also suggest including national labs to support research and development activities by utilizing the mechanisms in SGC's climate change research program that enable the Labs to be compensated.

- **Support for Partnership Types:** We support the various eligible partnership types, particularly the "Collaborator" role, which provides flexibility for those facing capacity constraints or with board/council decision-making processes and timelines that may be out of sync with the program application timeline. We recommend including regional climate collaboratives under partnership and co-applicant guidance as collaboratives are well-positioned to support capacity building, coordination, and dissemination activities, as well as various additional activities.

- **Revise Partnership Agreement Requirement:** We support that a partnership agreement is only required for awarded applicants (and not as part of applications), but recommend making this a required task as part of each awarded project's scope of work to minimize unfunded work, recognizing that grantees cannot request reimbursement for any work completed before the execution of the grant agreement.

- **Consider Formula-based Funding:** We support the program's intent to award at least one planning or implementation project in each region and the flexibility granted for applicants to self-identify their region. To ensure an equity-driven approach that prioritizes communities most impacted by extreme heat illness and mortality, we also recommend structuring the program to include both competitive and formula-based funding. This can ensure that underrepresented and Heat Vulnerable Communities can be supported by this program despite not having sufficient resources (i.e., capacity, funding, available staff, etc.) to provide ICARP with a competitive grant application.

![ARCCA logo]

IV. Planning Grant Program

- **Separate Cool Pavements from Mechanical Shade:** We recommend separating cool pavements and mechanical shade as part the jurisdiction-wide plans provided as an example of an eligible planning activity. Providing greater flexibility will allow applicants to determine which of the two to prioritize depending on their particular community's capacity and need, as well as what is feasible based on the grant size and project team's capacity.

V. Implementation Grant Program

- **Increase Large Implementation Grant Size:** The $5 million ceiling for large implementation grants can make it challenging to implement projects addressing multiple implementation tracks, such as infrastructure combined with insurance pilot programs as these can each be quite costly on their own. If EHCRP staff are interested in awarding multi-track projects of significant scale, a $10 million ceiling might be more reasonable.

- **Support Alignment with Statewide Extreme Heat Action Plan:** We support the alignment between EHCRP implementation grant tracks and the Statewide Extreme Heat Action Plan. We believe that this is a strategic approach that will lead to greater State/local coordination on addressing extreme heat and building community resilience.

VIII. Grant Administration

- **Consider More Frequent Reimbursement Schedule:** We understand the financial capacity requirements needed for large implementation grants. However, due to the reimbursement nature of the grant, the average quarterly invoices would be $500,000 for a $5 million award. This could create a significant barrier for a number of agencies and organizations that can prevent an otherwise well-suited project from applying to this grant program. To ensure accessibility, uplift CBO leadership, enable capacity building in grant administration, and support the program's goal of inclusivity, we recommend allowing for monthly invoices by request.

- **Support No Match Funding:** We appreciate that match funding is not required as part of the EHCRP. 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 EHCRP funding to be used to provide the required match funding to release other funding or for other grant opportunities.

VI. Preparing and Submitting an Application

- **Further Streamline Small Grant Type Applications:** While we appreciate the reduced partnership requirements for small grant types, some applicants may question the competitiveness of a single-applicant application based on the program's prioritization of multistakeholder partnerships. We recommend identifying additional ways in which the application process can be

streamlined for small grant types to right-size the application lift for the award level compared to large grant types.

- **Clarify Purpose of Pre-Screening Surveys:** We generally support multi-phased application processes that are structured to provide targeted technical assistance for applicants and/or to include a disqualifying round that can limit the number of collective hours spent preparing applications based on available funding. However, the purpose of the EHCRP pre-screening survey is unclear. We recommend providing additional clarity on how pre-screening survey responses will be used (e.g., will program staff be providing feedback? Will it support a lighter lift for small grant type applicants? Will the information collected be used to pair applicants with better suited grant programs?).

VII. Scoring Criteria

- **Scoring Rubric Recommendation:** We recommend including a scoring rubric in the Final Guidelines to provide applicants with more tangible guidance on how to make their application more competitive and to meet program staff expectations. A scoring rubric can serve as a filtering tool to help interested applicants inform their decision to apply, where to dedicate limited time in application development, and gauge the suitability and competitiveness of their proposal as they navigate multiple other funding opportunities. 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).

- **Support Alignment with Other ICARP Grant Programs:** We appreciate that many of the questions in the EHCRP application are similar to questions in the RRGP and APGP applications. This allows applicants to utilize and refine existing language, creating a lighter lift for applicants facing time constraints.

- **Clarify Community Engagement Plan Requirements:** We recommend providing greater clarity around the optional Community Engagement Plan and reviewing any templates that may be provided from the perspective of different types of projects. The Community Engagement Plan provided for the RRGP application led to confusion for some applicants (e.g., applicants needed to fill out the engagement plan from the perspective of the lead applicant rather than the collective project team, which made it difficult to reflect the unique relationships that different partners could bring to bear).

VI. Unselected Applications

- **Clarify Support for Unselected Applications:** We appreciate ICARP's intent to support unselected applications in accessing other funding programs. We recommend providing additional information on the types of support that ICARP staff can provide, which will ideally be more robust and targeted than pointing applicants to other grant programs.

VII. Selected Applications

- **Clarify Reporting Requirements:** The Draft Guidelines indicates that mid-term and final reports will be required, but also notes quarterly reports in different sections. We recommend clarifying reporting requirements and streamlining these requirements to the fullest extent possible, especially with consideration to required check-ins with EHCRP staff.

  In addition to providing progress report templates to grant recipients, we recommend providing additional information in the final guidelines on anticipated reporting requirements (e.g., report length, required content, etc.) to enable applicants to more accurately estimate resources needed for reporting in their project budgets.

- **Clarify EHCRP Check-Ins and Peer-to-Peer Learning Requirements:** We support greater EHCRP staff involvement in awarded projects through regular check-ins. We recommend providing greater clarity in regards to check-in frequency, participation expectations, format, and required participation from the project team to inform budgeting for staff time across partners.

  We also recommend providing similar information regarding quarterly peer-to-peer learning session requirements to inform project budgets.

- **Host First Workshop During Application Period:** We recommend conducting the Extreme Heat 101 workshop referenced in the Draft Guidelines soon after the NOFA launches. This can provide interested applicants with important background needed to develop competitive applications, particularly for community-serving organizations with limited past engagement around extreme heat risks, vulnerabilities, considerations, and solutions.

  We also recommend refining post-award workshop topics based on the expressed needs and interests of grant recipients and making workshop resources publicly available to help applicants prepare for future EHCRP rounds of funding.

VII. Appendix

Appendix A: Eligible and Ineligible Costs

- **Support Eligible Costs:** We 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 EHCRP-funded projects can support California in growing the climate workforce direly needed to accelerate climate resilience efforts, particularly in under-resourced, heat-burdened communities.

  We support the inclusion of food and refreshments as eligible costs as these are critical for successful community engagement events. We also support that pre-development construction

costs are eligible as part of implementation projects, which will help to address the common gap between planning and implementation that create significant barriers to advancing projects in a timely manner.

We also recommend clarifying whether on personnel costs for "project management and grant administration" are only eligible for implementation projects or also for planning projects.

- **Clarify Program Meeting/Workshop Budget Allocation:** Due to the wide range of grant award sizes ($100k-$5mil), the recommended 3% allocation to program meeting and workshop attendance will vary greatly ($3,000 - $150,000). We recommend providing clearer guidance that provides flexibility for smaller grant awards to allocate more than 3% (and vice versa for larger grants), as well as to specify participation expectations (e.g., one project representative or full project team).

- **Support Indirect Cost Cap:** We appreciate the indirect cost cap of 20% as we have heard from many partners that the more common 10% cap has been too restrictive. A 20% cap will allow organizations that have been historically under-resourced to benefit from additional administrative support.

- **Reconsider Ineligible Costs:** While we support the ineligibility of "fossil-fuel powered appliances and infrastructure, such as diesel generators and gas-powered appliances," we also recognize that some implementation projects may need to rent a generator if other options are not available or deemed cost-prohibitive. We suggest providing additional guidance on cost-effective alternatives for applicants to consider as part of their work plans and budgets.

Appendix G: Work Plan Template

- **Pre-fill Work Plan Template:** We recommend pre-filling the work plan template with the required activities of each grant type (e.g., case studies, progress reports, EHCRP staff check-ins, quarterly peer-to-peer learning, etc.) for additional clarity and to streamline the work plan development process for all applicants. While this may seem like an unnecessary step, pre-filling the work plan can help applicants save valuable time and avoid mistakes that can result in a disqualified application.

We also recommend providing a word limit for sub-task descriptions and additional guidance on the level of detail that should be included. This can help applicants navigate ongoing capacity constraints to more effectively direct limited staff time to meet the expectations of EHCRP staff.

Appendix H: Budget Template

- **Test Budget Templates:** We strongly recommend testing the budget template for different project and cost types to ensure the template is appropriately structured for the wide variety of eligible projects and activities under EHCRP. This can help to avoid issues that several RRGP applicants faced in the final hours of submitting applications.

- **Include Budget Requirements in Main Guidelines:** We recommend that key details provided in this appendix (including required costs and recommended budget allocations for evaluation, peer-to-peer learning, and new partnership development) be included in the main guidelines to avoid confusion.

Thank you for the opportunity to respond to the Extreme Heat and Community Resilience Program Draft Round 1 Grant Guidelines and provide our 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 this new important program. Please do not hesitate to reach out to Julianna DeNike, ARCCA's Facilitator, at jdenike@civicwell.org if you would like to discuss any of our comments further or if you have any questions.

Respectfully,

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