

December 6, 2016

Mary Nichols
Chair, Air Resources Board
1001 "I" Street
Sacramento, CA

RE: Draft Funding Guidelines Supplement for FY 2016-17 Funds

Dear Chair Nichols:

The Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) welcomes the opportunity to provide comments on the Draft Funding Guidelines Supplement for FY 2016-17 Funds (Supplement).

ARCCA is a network of existing regional collaboratives from across California. Our members represent leading regional collaboratives that are coordinating and supporting climate adaptation efforts in their own regions to enhance public health, protect natural systems, build economies, and improve quality of life. Through ARCCA, member regional collaboratives come together to amplify and solidify their individual efforts, as well as to give a stronger voice to regionalism at the state and federal levels. ARCCA members share information on best practices and lessons learned; identify each region's most innovative and successful strategies; and determine how these strategies could be adapted to another region's particular needs. As a result, ARCCA bolsters the efforts of member collaboratives and empowers those interested in forging new regional partnerships. ARCCA's membership covers nearly 80 percent of the state and includes leading collaboratives from the San Francisco Bay Area, Los Angeles region, San Diego region, Capital (Sacramento) region, and the Sierra Nevada.

We appreciate the time and effort that went into developing the draft Supplement, and offer a few suggestions for improvement that we hope you will find valuable.

1. **Streamline guidelines and reporting requirements:** A fundamental barrier to implementing projects resides with funding availability and requirements. Local government agencies, particularly those serving disadvantaged communities, face numerous resource constraints that can hinder their ability to keep track of multiple sets of eligibility, tracking, and reporting requirements. Despite their need for support, local agencies are often discouraged from applying for funding opportunities if the conditions seem too demanding or too difficult to meet due to their limited capacity.

Additionally, for the Transformative Climate Communities Program, the pass through of reporting and criteria to each agency based on project selection undermines the program's goal of catalyzing comprehensive cross-cutting projects. Requiring agencies administering the funds

to use existing criteria and reporting requirements could lead to another piecemeal approach to project implementation rather than one that is more holistic and transformative.

We recommend ARB to work with relevant State agencies to streamline eligibility criteria and reporting requirements to lift the administrative burden from local agencies.

2. **Provide greater specificity:** We recommend utilizing clear, unambiguous language or providing additional resources to help applicants fully understand and meet eligibility criteria. For example, “significantly reduces flood risk” can have a range of interpretations depending on how familiar the local agency is with anticipated climate impacts, their community’s vulnerabilities, and the best available data, models, and resources regarding flood risk.
3. **Re-evaluate criteria:** We encourage ARB to consider the following recommendations to specific criteria provided in the Supplement.
 - a. For criteria determining if a project “*meaningfully addresses important community needs,*” we recommend requiring that agencies or applicants use at least one approach that involves direct contact with or from affected communities, such as community meetings to solicit input and/or emails or letters from community groups or individual residents, to ensure local participation in the identification of community needs.
 - b. For *Woodsmoke Reduction*, we recommend:
 - i. considering the implementation of a project that reduces woodsmoke in a downwind disadvantaged community (within a certain radius upwind); given how airsheds can transmit particulates from the source to a downwind area, projects in an upwind community can provide benefits to the downwind disadvantaged community in focus;
 - ii. considering forest management projects to reduce wildfire risk by removing dead and dying trees as an eligible project that can provide both health and economic benefits to downwind communities; and
 - iii. removing preferential scoring in this program for projects *within or providing benefit to disadvantaged communities* since: 1) AB 1613 does not tie the Woodsmoke Reduction program to disadvantaged communities, and 2) the current SB 535/CalEnviroscreen DAC definition excludes most communities in rural forested areas of the state, which are the very communities most likely to use woodstoves as their primary or sole source of winter heat.

And finally, there appears to be a typographical error in Table 1 on page 4 in which the amounts for the CalFIRE Forest Health and Urban & Community Forestry programs are reversed (Forest Health should be \$25 million and Urban Forestry should be \$15 million).

We hope these comments are helpful to your efforts, and welcome the opportunity to provide additional clarification or support development of specific language as desired.

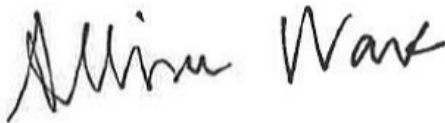
Sincerely,



Larry Greene
ARCCA Chair
Capital Region Climate Readiness Collaborative



Amy Hutzler
Bay Area Regional Collaborative



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