

July 12, 2024

California Natural Resources Agency
715 P Street
Sacramento, CA 95814
Email: climateresilience@resources.ca.gov



RE: California Climate and Energy Collaborative (CCEC) Comments on the Draft California Climate Adaptation Strategy

Dear OPR and CNRA Leadership and Staff,

The California Climate and Energy Collaborative (CCEC) welcomes the opportunity to provide comments in response to the Draft California Climate Adaptation Strategy. [CCEC](#) is a program of CivicWell that supports California local governments and their partners in their efforts to save energy, reduce greenhouse gas emissions, and accelerate climate action by building knowledge and networks amongst practitioners.

We are increasingly developing ways to foster better two-way communication between State and local agencies to better reach mutual energy and climate goals, and welcome greater collaboration with the State. In the past year we have operated the [State and Local Energy and Climate Coordination](#) (SLECC) meetings with participation across roughly one hundred local governments and 6 State agencies. We greatly appreciate that CNRA and OPR representatives engaged with several regions during this comment period and even requested to present the Climate Adaptation Strategy and obtain feedback from 130 attendees at our most recent meeting on June 25th in Palm Springs. This meeting took place alongside our Annual CCEC Forum on the theme of *Collective Innovation: Cultivating Collaboration for Equitable Climate Action* for over 420 attendees.

Our network of local governments and their partners across the state are working to mitigate emissions to avoid the worst impacts of climate change while also planning for, managing, and recovering from the community impacts already resulting from record-breaking wildfires, heat waves, floods, drought, and repeated electricity outages. We recognize CNRA and OPR as a global leader in proactive climate resilience policy and applaud CNRA and OPR's considerable efforts to develop the Draft CA Climate Adaptation Strategy. We appreciate the report's bridging of mitigation as part of the continuum of climate adaptation. We also recognize the Climate Adaptation Strategy as a critical tool to meaningfully boost efforts to accelerate California's efforts to build resilience while elevating priorities related to equity, and environmental justice for segments of California communities most in need. Our network shares the State's desire to foster effective, on-the-ground implementation of equitable adaptation solutions in coordination with regions and communities throughout California.

We support most positions and priorities reflected in the Climate Adaptation Strategy. We highlight a few of the priorities of particular interest to our network to relay initial comments and suggestions.

PRIORITY: Strengthen Protections for Climate Vulnerable Communities

GOAL A: Engage with and build capacity in climate vulnerable communities

Where assistance programs do exist, accessibility and application burden remain major barriers. The recently published [Better Funding](#) report, produced by Prosper Sustainably with support and guidance from several organizations, including CCEC, explores how State and federal agencies can “better” engage and fund CA local and tribal climate needs. It synthesizes and catalogs themes gathered through years of active input generously given by community serving practitioners, including local and tribal governments and those that work with them. Over 70 suggested ideas cover different stages of the grantmaking process and range from basic to bold, such as streamlining program design engagement, simplifying applications, and options for more effective technical assistance. If implemented, these ideas can significantly reduce the crippling burden on communities of accessing dollars, thereby leaving more capacity to accelerate climate action on the ground.

While there are many ways to improve traditional engagement and funding vehicles, this report suggests that State and federal agencies must do more than tweak around the edges of traditional programs. To unlock local and tribal potential at the scale and speed needed, and with minimal burden, the report proposes piloting a new, potentially ideal approach to funding deployment. This approach pairs a State-led funding pipeline (Investible Climate Communities) with regional-based engagement and project scoping support (California Regional Energy and Climate Hubs (REACH)). A lasting, two-way body like REACH, which would convene the State with key climate stakeholders, would streamline an otherwise chaotic landscape of engagement across multiple agencies and topic areas that absorbs too much limited capacity at the State and local level.

This report was recently cited by the by the Strategic Growth Council in its recent [Priority 3 on Housing, Climate, and Equity Progress Report](#) related to its goal to decrease burdens on applicants for State funds. The progress report also cited CCEC’s SLECC meetings as a useful vehicle for streamlining state and local meaningful engagement.

GOAL B: Improve understanding of climate impacts on California’s communities, including what drives vulnerability

At the June 25 SLECC meeting, participants of the session on the Climate Adaptation Strategy raised questions about how local governments communities can use the Climate Adaptation Strategy for the benefit of their communities and in their own planning and implementation efforts. We discussed the importance of the State understanding local needs and for local governments to understand what is needed of them to help build the State’s resilience. Some hoped that the State could translate or downscale this report to give more clarity to local communities as to the priorities they should be focused on, and which are estimated to have the greatest impact, ideally with funding to assist with local implementation. The scale of need for investment for the increasing impacts on communities is far beyond the capacity of the local tax base. Our network also notes that community scale adaptation plans typically address specifically identified climate vulnerabilities. While we appreciate the high level priorities and goals illustrated in this report, the CCEC network would benefit from seeing a more direct linkage between statewide and regional climate

vulnerabilities identified in the CA Climate Assessment, the data tools mentioned, and place-based strategies to reduce risk and build resilience.

GOAL C: Build resilience in climate vulnerable communities through state programs

We are particularly interested to see updated Action 2 related to expanding the Regional Forest and Fire Capacity Program throughout the state and increasing local and regional governments' capacity to build and maintain a pipeline of forest health and fire prevention projects. This programmatic approach is consistent with the pilots proposed in Better Funding, which establishes regional hubs across the State to help communities develop and fund a pipeline of funding-ready climate projects, including from unawarded grant applications. We recommend considering a broader approach that can address many regional climate needs and flow through TA from multiple agencies, rather than an isolated program. There are several other State agencies (e.g. SGC, IBank) and NGOs developing project pipelines to ease the burden of identifying and funding needed projects.

PRIORITY: Bolster Public Health and Safety to Protect Against Increasing Climate Risks

GOAL B: Consider future climate impacts in governmental planning and investment decisions

The CCEC network would be interested in coordinating with the State on how to effectively deploy Action 1: Provide specific and actionable guidance and technical assistance to local communities on sustainable, resilient, and equitable planning for land use and community development, transportation, and resource preservation that advances the State's climate goals.

PRIORITY: Partner and Collaborate to Leverage Resources

GOAL A: Collaborate to build climate resilience across sectors and region

Again, CCEC proposes that there is an opportunity to streamline, centralize, and formalize a State-led administrative vehicle of regional hubs (e.g. REACH) dedicated to accelerating state, tribal, and local adaptation efforts through sharing of best practices, facilitating collaborative partnerships, and direct investments, including from federal sources. We would be very happy to partner with the Integrated Climate Adaptation and Resiliency Program to consider an effective model of interagency, State-led deployment of these services. Other items under this goal referring to collaboration with local and tribal governments on a variety of climate topics can be served by this vehicle, thereby leveraging capacity and resources of multiple programs.

Local governments will have much more input to offer beyond these initial suggestions to the extent the State wishes to continue to solicit the co-creation of solutions through SLECC or other venues.

In conclusion, local governments and other community-serving organizations can serve as the State's best partners in achieving the climate resilience and equity goals outlined in the Climate Adaptation Strategy. As federal funding opportunities continue to become available, a closer relationship can mean that the State is guided by community expertise as it designs and proposes

future programs and projects. With closer collaboration and strategic investments and operations decisions, the State can alleviate burdens and barriers impeding greater progress at the local level.

Thank you for the opportunity to review the Draft Climate Adaptation Plan and relay comments from our statewide network. We greatly appreciate your time in considering our comments and recommendations and welcome further discussion. We remain committed to knowledge exchange, best practices, policy and funding tracking, and convening for our extensive network of local governments and their partners, and look forward to working in partnership with CNRA and OPR leadership and staff to support the advancement of climate adaptation priorities. Please do not hesitate to reach out to Angie Hacker at ahacker@civicwell.org if you have any questions. We hope you will continue to participate in our SLECC meetings or reach out if CCEC can be helpful in distributing climate information or coordinating listening sessions with our network.

Respectfully submitted by Angie Hacker, CCEC's Statewide Best Practices Coordinator, on behalf of the California Climate and Energy Collaborative (CCEC).