RE: Recommendations for May Revise Budget, Climate Resilience Package

Dear Pro-Tem Atkins, Speaker Rendon, Senator Skinner and Assemblymember Ting:

The Local Government Commission, along with a broad coalition of practitioners, non-profit organizations, and state and federal leaders agree that the unprecedented challenge of climate change requires a response equal to the challenge. An effective climate strategy for California must address both climate change mitigation (GHG emissions reduction) and climate change adaptation (building resilience to climate impacts). While both strategies are critical, climate resilience policies and programs are both long overdue and largely unfunded, even though the avoided costs and return on adaptation investment are substantial.

The Governor’s proposed May revised budget is a helpful start in the direction of funding climate resilience at the level necessary to make more than incremental progress, but does not go far enough to recognize the resources needed to truly meet local needs. Greater investments in climate resilience can energize and empower Californians to make dramatic progress on climate resilience planning and implementation. The recommendations in this letter are framed through governance: cities and counties, regional agencies, and regional collaboratives, with equity and community-based action as a consistent theme through all levels of climate resilience needed to prioritize actions that support under-resourced communities.

We write to urge you to take historic action to make California an international model for climate resilience planning and implementation. The broad coalition of organizations jointly submitting this letter request an adjustment to the Governor’s budget requests on climate resilience to make a one-time investment of $1.555 billion dollars to enable every city and county in California to engage their communities and collaborate with adjacent jurisdictions on local and regional resilience planning and implementation. We ask you to take four primary actions to support climate resilience, with EQUITY as an integral part of all actions. For more detail, please see the additional supporting actions in the table at the end of this letter.

1. **LOCAL PLANNING ($550M)**: Fund all cities and counties in the state to ensure all 482 cities and 58 counties have the resources they need to establish plans, consistent with state law, to address climate adaptation and resilience, including funding for under-resourced and marginalized communities to engage in and inform planning efforts;
2. **SCIENCE-BASED POLICY ($150M):** Support regional agencies in the development of regional vulnerability assessments and the climate services needed to support assessments to inform regional planning and local planning;

3. **REGIONAL LEADERSHIP ($100M):** Support existing regional collaboratives through the Alliance of Regional Collaboratives for Climate Adaptation, the California Stewardship Network, and other similar coordination networks to support the collaborative development of holistic and aligned regional planning documents to guide regional and local agencies in policy development and program/project implementation; and

4. **IMPLEMENTATION ($350M):** Lastly, fund the implementation of climate adaptation and resilience programs and projects to enable communities to build resilience to the climate change impacts they are already experiencing.

The OPR 2020 Annual Planning Survey assessed the General Plan status in a majority of California’s cities and counties. It documents how most jurisdictions are years behind in updating their various plan elements, and on implementing policies in those elements. The Governor and legislature can make California an international leader on climate resilience by offering guidance, funding, science, and technical support to accelerate both individual city and county general plans as well as regional agencies and collaboratives that produce regional adaptation and resiliency plans.

The investment proposed here will enable cities, counties, and regions of California to collaborate with civic leaders and state agencies to address these hazards. This proposed funding will also support local and regional climate adaptation and resilience planning while also supporting general plan updates. These adaptation plans and updates will expedite solutions to immediate hazards, while also addressing the longer term challenges of heat, sea level rise, wildfire, water supply, and flooding from extreme storms.

Many climate adaptation challenges depend upon land use decisions and public policies that are developed and implemented at the local (city and county) level. By helping jurisdictions rapidly update general plan elements, you will also empower these communities to begin to address the major challenges of housing and environmental justice per general plan requirements.

An additional component of this request is that funding to support the development of regional adaptation plans through AB-897, would ensure comprehensive vulnerability assessments at the regional scale and would bring local jurisdictions together to collaborate on the development of regional plans, policies, and on implementation. This approach avoids redundancy of highly-technical vulnerability assessments at the jurisdictional level, providing additional resources to be directed toward policy alignment, project implementation and community engagement. Through this alignment, vulnerability and adaptation analysis, policy, and implementation could be collaboratively implemented within and across regions, and more easily supported by the State through regionally focused technical assistance programs that support implementation.

Many communities are also opting to link adaptation, environmental justice, and land use planning together in near-comprehensive general plan updates. Housing elements tend to also be a part of the package as a housing element update triggers the update to the Safety Element. When two or more elements of a general plan are updated, environmental justice requirements via SB-1000 are also triggered. Lastly, with Local Coastal Plan sea level rise requirements linked closely to the work occurring in Safety Elements and Local Hazard Mitigation Plans (LHMPs), there is a natural inclination to connect these initiatives as a comprehensive package of updates. The Governor’s existing proposal does not
recognize the interconnectedness and cost of doing this work and the need to have funding aligned within an agency that understands how these pieces of local and regional policy interconnect. The cost to update all of these elements and plans, to address the public process required, and the CEQA process to support defensible policy, means that the overall cost of these updates can exceed $500,000, and even exceed $1,000,000 in some instances. These costs may be significantly reduced through investment in regional collaboration and planning, plan and policy alignment, and collaborative project and program implementation.

Your support of this bold adaptation strategy will advance these statewide climate resilience policies:

- **SB-379**, passed in 2015, requires vulnerability assessments, adaptation and resilience goals, policies and objectives, and implementation measures in city and county general plans.
- **AB-897**, currently being considered by the legislature, would direct OPR to set criteria to align state and regional adaptation plans, and a framework for essential collaborations to create and implement regional adaptation plans.
- **SB-1072**, passed in 2018, creates regional collaboratives and technical assistance programs to support community driven planning initiatives through the transformative climate communities program.
- **AB-2722**, passed in 2016, created the Transformative Climate Communities (TCC) program to fund the development and implementation of neighborhood-level transformative climate community plans that include greenhouse gas emissions reduction projects that provide local economic, environmental, and health benefits to disadvantaged communities.
- **AB-106**, being considered now in the legislature, would support the Regions Rise Together grant program to support economic resilience.
- Prioritization of equity and environmental justice, consistency with **SB-1000** environmental justice mandates in general plans, strong linkages between housing and climate change, and related avoidance of maladaptation (the tendency to continue supporting efforts that are contrary to long-term resilience goals or that produce unintended consequences).

Without funding, these well-intended goals, policies, and actions are unlikely to be implemented at the pace and scale required to meet the challenge and the opportunity we face in this unique time in history. Your leadership will make it possible to align local and regional adaptation policies and actions with statewide efforts. Importantly, this will also support the engagement of disadvantaged communities. It can provide essential, locally relevant scientific and technical support. It will implement the advice of the 2019 LAO Report on how the state can support coastal efforts to address sea level rise. It will directly support local and regional efforts to achieve California’s ‘30 by ‘30’ goal. It will also support general plan updates to bring all general plans up to date with housing, safety, wildfire, environmental justice, hazard mitigation, and local coastal planning.

Lastly, as OPR maintains the General Plan Guidelines, supports the CEQA Guidelines, and is focused on developing the strategy for a Just Transition, OPR would be able to support the thoughtful and data-informed approach to providing grant support to local and regional governments and existing collaboratives.

Our proposed budget amendments, summarized below, offer a once-in-a-generation investment to dramatically advance climate adaptation and resilience in every California community. This table provides a more detailed breakdown of possible funding categories outlined in the 4-point list highlighted earlier in this letter.
<table>
<thead>
<tr>
<th>May Revision, Climate Resilience Package (Millions)</th>
<th>Local Adaptation Leaders Request (Millions)</th>
<th>Adaptation Action</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>$25 OPR Climate Adaptation &amp; Resilience Planning Grants</td>
<td>$400</td>
<td>Local Government Adaptation Plans</td>
<td>Additional funding is needed to support California’s 482 cities, 58 counties, and 109 Tribes. Provide multi-year grants to cities and counties to complete and begin implementing adaptation policies in their general plans (per SB-379). Link this funding to incentives and support for collaboration with adjacent jurisdictions to create regional adaptation plans (per AB-897).</td>
</tr>
<tr>
<td>$25 * CalEPA Environmental Justice Initiative</td>
<td>$150</td>
<td>Under-resourced Communities</td>
<td>Funding to build capacity within and engagement with under-resourced, marginalized, low-income, and rural communities in local/regional adaptation planning and implementation efforts.</td>
</tr>
<tr>
<td>$16.5 State Parks SLR Adapt. Strategy, Cal-Adapt</td>
<td>$50</td>
<td>State Policy Guidance</td>
<td>Staff OPR to provide guidelines and technical support for regional adaptation planning (per AB-897) and to play a key role in overall grant administration to 500+ cities and counties.</td>
</tr>
<tr>
<td>$0</td>
<td>$50</td>
<td>Regional Government Leadership</td>
<td>Fund regional governance bodies (e.g. C2M Agencies, Regional Boards, and COGs/MPOs) to facilitate and support regional adaptation planning and to advise/support grant distribution and administration in their regions.</td>
</tr>
<tr>
<td>$20 Regional Climate Collaboratives</td>
<td>$50</td>
<td>Regional Collaborative Groups</td>
<td>Support established regional collaboratives focused on adaptation like the seven regional collaboratives in the Alliance of Regional Collaboratives for Climate Adaptation (ARCCA), to provide forums for networking and coordination among local planners, regional agencies, and community leaders. Fund these groups, in addition to supporting the formation of SB-1072 collaboratives.</td>
</tr>
<tr>
<td>$22 Fifth Climate Assessment</td>
<td>$100</td>
<td>Regional Climate Services</td>
<td>Fund the next statewide climate assessment and support regionally-trusted entities with proven experience to provide scientific and technical support to advance multi-jurisdiction collaboration based on common data and analysis.</td>
</tr>
<tr>
<td>$200</td>
<td>$200</td>
<td>Coastal Wetlands Restoration</td>
<td>We support the inclusion of $200M to the Ocean Protection Council for coastal wetlands restoration.</td>
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<tr>
<td>$200</td>
<td>$200</td>
<td>Extreme Heat</td>
<td>We support the inclusion of $200M to address extreme heat issues and support urban greening.</td>
</tr>
<tr>
<td>$0 *</td>
<td>$350</td>
<td>Implementation</td>
<td>Fund climate adaptation implementation projects, subject to completion of General Plan updates. This will jumpstart key pilot projects where planning has occurred. It also provides an incentive to cities/counties to update their General Plans.</td>
</tr>
<tr>
<td>$508.5 *</td>
<td>$1,555</td>
<td>Total</td>
<td>The level of investment requested would enable local communities to lead the type of community engagement, planning, collaboration, and implementation activities necessary to build community resilience to climate impacts and long-term capacity to address the more difficult climate challenges ahead.</td>
</tr>
</tbody>
</table>

* The Administration has proposed $420M for the Transformative Climate Communities (TCC) program. Per AB-2722, TCC funds development and infrastructure projects to reduce air pollution in underserved communities. In addition to this important climate mitigation effort, the cascading and compound nature of climate change impacts require holistic adaptation solutions.
We greatly appreciate your consideration of our request and welcome any questions or feedback. We also stand ready to organize a call to discuss our request – with the broad coalition of 56 public agencies, community-based organizations, nonprofits, collaboratives, universities, and private sector firms, or with specific stakeholder groups that you are particularly interested in connecting with. Please do not hesitate to contact Julia Kim at jkim@lgc.org.

Respectfully,

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