

**FY 2017-18 Final Draft SB 1 Adaptation Planning Grant Guide  
Comment Log**

September 11, 2017

Organization	Page	Comments
Blais & Associates	2	I was reviewing the DRAFT guidelines for the Adaptation Planning Grant and noted that the eligible applicant section on page 2 only lists *Others.
Blais & Associates	General	<p>In addition, there are no scores listed for the narrative questions as there are listed in the Sustainable Transportation Planning Grant Guidelines:</p> <ul style="list-style-type: none"> <li>oProject Description (xx points)</li> <li>oProject Justification (xx points)</li> <li>oGrant Specific Objective (xx points)</li> <li>oProject Management (xx points)</li> </ul> <p>I was wondering if this is part of the comment period decision or if it is an oversight?</p>
California Coastal Commission	6	<p>Relatedly, the State has recognized the need to encourage coastal zone jurisdictions to plan for and address sea level rise through updates to Local Coastal Programs, and has funded numerous grant programs over the past several years to support jurisdictions to undertake vulnerability assessments and incorporate sea level rise adaptation strategies into LCPs, including components to address transportation resources. The Caltrans Adaptation Planning Grant Program thus provides a critical opportunity to continue and build upon this important body of work. We suggest emphasizing this opportunity by adding a bullet to the list of items that applicants should demonstrate (middle of pg. 6) stating, “Continuing, building upon, implementing or expanding sea level rise adaptation plans that have been developed through other State grant programs (e.g. Coastal Commission LCP Local Assistance grants, Coastal Conservancy Climate Ready grants, OPC LCP Sea Level Rise grants)”.</p>
California Coastal Commission	7	<p>Through Commission staff’s work with local jurisdictions to address sea level rise, one transportation-related need that has been identified is a better understanding of how coastal public access will be impacted over time by sea level rise (including both temporary storm flooding in the short-term, and the long-term loss of beaches, parking lots, Coastal Trail segments and other accessways) as well as what types of phased adaptation approaches could be used to address these impacts. We suggest including focused assessments of impacts to public access via all modes of travel to and along the coast from sea level rise. Feasibility studies for such adaptation strategies, like phased realignment/relocation of access ways, also should be added to the list of example projects (pg. 7).</p>

Comment Log

Organization	Page	Comments
California Coastal Commission	9	<p>Add the Coastal Commission’s Statewide Sea Level Rise Vulnerability Synthesis to the list of Tools and Resources for applicants (pg. 9). This report contains a synthesis of sea level rise vulnerability assessments that have been completed throughout the state, a summary of key findings and conclusions from the Coastal Commission perspective, and several cases studies on efforts to update LCPs to address sea level rise.</p>
California Coastal Commission	3, 6	<p>The Coastal Commission strongly believes that incorporating considerations of climate change impacts on transportation into Local Coastal Programs (LCPs) and other local and regional planning documents is critical for ensuring that adaptation strategies are developed and implemented in a proactive manner. Commission staff has been working with partners from FEMA, NOAA, USGS, the State Coastal Conservancy, and others to better integrate resilience planning across LCPs, Local Hazard Mitigation Plans (LHMPs), General Plans (GPs), Climate Action Plans (CAPs), and similar documents, and we appreciate the reference to integrating transportation planning considerations into existing plans as an example project that could be funded by this grant program. Given the criticality of this type of integrated adaptation planning work, and the necessity of better aligning transportation and land use plans for adaptation efforts to succeed, we suggest including and emphasizing this concept throughout the Grant Application Guide. Specific suggestions for where this could be discussed include the following:</p> <ul style="list-style-type: none"> <li>a. Add a bullet to the list of State Initiatives that applicants should seek to address (pg. 3) stating, “Incorporating adaptation strategies across local and regional plans (e.g. LCPs, LHMPs, GPs, CAPs)”. Consider also adding a reference to SB 379 in this list.</li> <li>b. Add a bullet to the list of items that applicants must demonstrate their projects will accomplish (top of pg. 6) stating, “Demonstrate that the funded project will be integrated with ongoing or planned efforts to update various local/regional plans (e.g. LCPs, LHMPs, GPs, CAPs) to address climate change.” While less desirable, this bullet alternatively could be added to the list of items that competitive applicants should include.</li> </ul>
Leadership Counsel for Justice and Accountability	2	<p><b>Removal of Required Local Match for Disadvantaged Communities</b></p> <p>The high upfront costs for planning and construction of projects should be recognized as a critical barrier to the agencies charged with representing disadvantaged communities most vulnerable to climate change. As cited in our previous letter, the local match of 11.47% is a structural barrier within the application process itself. Equity should serve as a guiding principle for designing local matches in this policy framework will also lead to a greater return and incentives for limited funding. As such, we recommend complete removal or, at minimum, a reduction of the required match for projects within the top 25 percentile of CalEnviroScreen 3.0.</p>

Organization	Page	Comments
Leadership Counsel for Justice and Accountability	3	<p><b>Add Set Aside for DACs in "Addressing Disadvantaged Communities"</b></p> <p>To ensure that vulnerable communities' needs are meaningfully addressed as aggressively as possible, we recommend that 50 percent of Adaptation planning grant funding be allocated for disadvantaged communities. Previous legislation and programs have set precedent for DAC set asides, now serving as a standard for equitable DAC investment. Furthermore, a 50 percent set aside is included within the current draft <i>Grant Application Guide for Additional Sustainable Communities Grants</i>. The draft document states "Supporting planning projects that benefit a disadvantaged community is a priority, therefore, a minimum threshold of 50 percent of Sustainable Communities Competitive Grants has been identified for projects that benefit disadvantaged communities..." To achieve a more equitable distribution of benefits and burdens regionally and statewide, Caltrans must ensure funds are directly accessible for the communities most at risk and most impacted. In the San Joaquin Valley alone, there are over 500 disadvantaged unincorporated communities.</p>
Leadership Counsel for Justice and Accountability	6	<p><b>Grant Specific Objectives</b></p> <p>To maximize the benefits of adaptation planning and in recognition that a well-rounded application will contain all elements, we suggest the following:</p> <p>Competitive applications should include <del>one or more of</del> the following:</p> <ul style="list-style-type: none"> <li>• Identification of and benefit to disadvantaged communities, including transit-dependent populations (when applicable)</li> <li>• Identification of vulnerable populations and their mobility needs and demonstration of how the proposed project responds to these needs</li> <li>• Demonstration of collaboration and partnerships with diverse external stakeholders such as business, non-governmental agencies, community-based organizations, and community residents</li> </ul>
Leadership Counsel for Justice and Accountability	18	<p><b>Require Letters of Support</b></p> <p>We also recommend Letters of Support to be a required component of the overall application rather than being a supplemental document. To demonstrate that the applicant agency has consulted with the target communities and is responding to their needs, we recommend the letters of support from community residents and community-based organizations should be required in the climate adaptation application.</p>

Organization	Page	Comments
Leadership Counsel for Justice and Accountability	General	<p><b>Transparency on Specific Scoring Rubrics</b></p> <p>We also continue to recommend that Caltrans provide more transparency around the specific scoring criteria rubrics that will be used to evaluate, rank, and select projects. While the current adaptation grant draft states that "the grant review committees evaluation applications for content, completeness, meeting technical requirements, overall relationship to statewide planning efforts, and compliance with state and federal planning requirements. Grant applications that address every aspect of the grant specific objectives will score higher overall." While it is proactive to suggest meeting multiple criteria will lead to more competitive applications, there is significant lack of detail for the specifics of scoring. To receive public comment on the scoring rubric, the specifics should be released for an additional round of comment. Furthermore, we recommend that the grant review committees provide each application with feedback regarding their application scoring to facilitate the improvement of low-scoring or incomplete applications for vulnerable communities.</p>
Pacific Forest Trust	1	<p><b>Keep the focus on adapting the transportation system to climate change impacts.</b></p> <p>This sentence on the first page of the grant application may unnecessarily constrict the types of allowable projects: "Funded projects are expected to not only adapt the transportation system to climate change impacts but also to benefit the multimodal transportation system." There are many necessary adaptation projects and planning efforts that will improve the resiliency of the transportation system without having additional direct benefits to that system. For instance, projects that reduce the risks of floods or fires on a public highway may not necessarily also involve improving those roadways. We suggest removing this sentence from the guidelines to allow for a broader array of projects that can help adapt the transportation system to climate change impacts.</p>
Pacific Forest Trust	2	<p><b>Allow nonprofits to be direct primary applicants.</b></p> <p>Under the draft guidelines, nonprofits are only eligible to apply as sub-applicants. However, many nonprofits have extensive experience in climate change adaptation planning. Nonprofits are also well suited to coordinating collaborations because their missions often cut across narrow department silos and across county lines. While there is always a trade-off between the number of applications and the time it will take to process them, we feel that including nonprofits would result in a greater interest in this grant process. More applications will likely improve the quality of selected grant proposals, and thus result in the more efficient use of grant funds for greater public benefits.</p>

Comment Log

Organization	Page	Comments
Pacific Forest Trust	3	<p><b>Recognize the nexus with additional state plans.</b>                      While the list of plans under the grant program considerations (beginning on page 3) is good, it is not exhaustive. Applications that also advance other state climate change adaptation goals – such as those presented in the Water Action Plan and the State Wildlife Actions Plans – should be given equal weight under the grant scoring criteria. It may also be worth considering not only how many different plans the proposed project can advance – but the quality of the nexus between the plans and the project. For instance, a project located in a priority area under one of these state plans might merit a higher weighting.</p>
Pacific Forest Trust	6	<p><b>Advance wildlife adaptation by mitigating transportation impacts.</b>                      Transportation systems can reduce the ability of wildlife to adapt to a changing climate by fragmenting landscapes, degrading critical habitat, and impeding migration. There are many opportunities to reduce the negative impact of transportation on wildlife beyond the required mitigation activities, such as by creating wildlife under and over passes. These wildlife crossings can reduce roadkill, support more resilient wildlife populations, and help advance state goals for wildlife adaptation to climate change. We recommend that the “Demonstration of how the project can advance wildlife adaptation” is included as one of the criteria for competitive applications.</p>
Sacramento Regional Transit District	2	<p>As a transit agency, it is important that we are able to apply for this grant as a primary applicant. Please continue to allow transit agencies to be eligible as a primary applicant.</p>
San Diego Association of Governments	7	<p>The final draft guidelines state that environmental studies, plans, or documents normally required for project development under the National Environmental Policy Act (NEPA) or the California Environmental Quality Act (CEQA) are an ineligible activity or expense. SANDAG would like to confirm that this precludes grant funding for environmental analysis, such as the preparation of a CEQA or NEPA document, but does not extend to planning work that would require environmental analysis.</p>
Trust for Public Land	1	<p><b>Project Benefits:</b> On p.1 of the Grant Application Guide, it states that “[F]unded projects are expected to not only adapt the transportation system to climate change impacts but also to benefit the multimodal transportation system”. While we understand and support the intended goal of encouraging multi-benefit state investments that both advance adaptation and multimodal utilization of the transportation system, we believe that this language will unnecessarily rule out projects that are essential to the short-term climate resiliency of the transportation system but may not result in direct multimodal improvements to the transportation system. We suggest that the underlined portion of the above phrase be removed and replaced with “Additional points will be given to proposals that not only adapt the transportation system to climate change impacts but also benefit the multimodal transportation system.”</p>

Organization	Page	Comments
Trust for Public Land	2	<b>Eligible applicants:</b> We would encourage the addition of non-profits as eligible primary applicants.
Trust for Public Land	2	<b>Local Match:</b> We would encourage that staff time from sub-applicants be eligible as cash match. We also request that the match requirement be reduced or eliminated for projects benefitting disadvantaged communities.
Trust for Public Land	11	<b>Project timeline:</b> We anticipate that a full scale Adaptation Planning project may take more than two years to complete. We recommend that the project timeline expand beyond April 2020.
Trust for Public Land	General	<b>Support Adaptation Planning Grant Program funding</b> The need for Adaptation Planning projects and the potential for these projects to transform communities is great. While we understand that SB 1 provides only \$20 million in total for this program, we strongly support increased funding for this program.
Trust for Public Land	General	<b>Application preparation:</b> We appreciate that Caltrans staff will be available during the application period to answer questions and help interested groups complete their applications but we would encourage Caltrans to provide potential applicants with the opportunity to discuss potential projects in advance of the application period to provide candid feedback on the competitiveness of project ideas.