Summary of Changes: Final Round 1 Adaptation Planning Grant Program (APGP) Guidelines

Summary

This document summarizes the key feedback received by the Office of Planning and Research (OPR) during the APGP Public Comment Period and the major changes then made between the Draft Round 1 APGP Guidelines and Final Guidelines. All changes were made public in the final guidelines published on January 6, 2023, reflected in the Notice of Funding Availability (NOFA), and Full Application.

Background

Engagement Overview

Over the course of a 9-month period, from March 2022 to November 2022, the Office of Planning and Research (OPR) undertook a statewide engagement process, engaging over 450 people, organizations, and state partners through public workshops, surveys and interviews to inform and support the development of the APGP.

APGP staff released the <u>APGP Engagement Summary</u> in July 2022. As part of this outreach, APGP staff notified the public of the release of the Draft Guidelines on September 28, 2022, for a 30-day public comment period and hosted four public workshops where program staff presented the Round 1 Draft Guidelines. During the public comment period, OPR received 273 unique comments and since then has made over 1,595 edits to the Round 1 Draft Guidelines.

Processing and Responding to Comments

APGP staff transcribed all public comments from workshops and received, reviewed, and categorized individual comments from over 57 emails and letters. Staff then worked with state agencies and partners to identify solutions and opportunities for clarification. Many public comments were supportive of overall program goals or specific elements of the program guidelines; in those instances, no changes were made to the guidelines.

Program staff were guided by the public comments received and influenced by the key takeaways from the APGP Engagement Summary. Furthermore, APGP staff made additional changes that were not directly suggested by members of the public, but rather were guided by the APGP Priorities and Goals. As staff made changes, they continued to ask the following questions:

- Will this change improve clarity for applicants and/or reviewers?
- Is this change identified as a priority by multiple interested parties?
- Will this change reduce the complexity of applying while maintaining integrity of the program?
- Will this change enhance the programs' ability to support equitable outcomes?

Is this change permitted by statute?

APGP staff are grateful to everyone who took the time to review and provide comment in their letters – the program is stronger thanks to all your involvement.

Key Changes

The following list of key changes are changes between the Draft Round 1 APGP Guidelines and the Final Guidelines document that APGP staff made to address the issues identified through the public comment process. Questions asked during the public comment period will be reflected in the APGP FAQ.

General Programmatic Changes

Workshop participants and members of the general public made several programmatic recommendations that did not fall within a specific chapter of the guidelines. Those general comments ranged from broad recommendations to enhance the program priorities to more specific recommendations about the application timeline. High level program changes are summarized below.

Key Feedback: The timeline is too short and might make it hard for some communities to gather the necessary resources needed to apply.

- **Public Recommendation (if any):** Extend and lengthen the application timeline therefore ensuring prospective applicants, especially vulnerable communities, a more realistic application timeline.
 - Change 1: Extended the timeline Staff extended the timeline, moving the original application period from November 26, 2022 - December 16, 2022 to January 6, 2023 - March 31, 2023.

Key Feedback: Some community-based organizations with limited capacity need support in determining which grant program best meets their needs and where to prioritize their time and resources.

- **Public Recommendation (if any):** Proactively offer clear and detailed program information, including comparisons to similar grant programs, when available.
 - Change 1: Added a one-page program factsheet The staff inserted a one-page factsheet into the guidelines with easy-to-read program information.

Key Feedback: The draft guidelines are lengthy and might be hard for rural and under resourced communities to apply to.

- Public Recommendation (if any): Simplify the guidelines by implementing a
 preliminary application process therefore ensuring prospective applicants, especially
 vulnerable communities, a more realistic application process
 - Change 1: Implemented a two-phase application process Staff developed a two-phase application process, including a preliminary "Intent Survey" component which allows prospective applications an opportunity to submit

- their ideas early and learn more about the program before making the final decision to apply.
- Change 2: Reduced duplicative information Staff revised the guidelines to remove duplicative information where possible.

Key Feedback: Require robust equity evaluation.

- Public Recommendation (if any): Recommend that the APGP guidelines 1)
 implement an equity evaluation in order to track progress toward realizing the
 program's equity goals, 2) pre-identify equity categories for awardee evaluation
 programs to measure the equity outcomes of their planning projects, 3) outline how
 OPR will work closely with applicants to engage closely with vulnerable communities
 and develop tailored equity indicators and metrics.
 - Change 1: Staff are considering multiple pathways to adhere to this feedback and develop a more robust equity framework for future rounds. To date, staff have revised the programs goals, eligibility requirements, application process, and scoring criteria to more explicitly address feedback around equity.

Key Feedback: It would help to provide reimbursements or advance pay for work done before the contract is executed, as many organizations, especially rural organizations identified as disadvantaged rural communities, lack significant financial resources to be able to front this expense.

- **Public Recommendation (if any):** Recommend offering advanced pay especially for disadvantaged communities.
 - No Change: APGP is not able to offer advanced pay at this time.

Changes Made by Section

I. INTRODUCTION

Key Feedback: Strengthen program focus on equity to ensure equitable outcomes, comprehensive community engagement, and shared decision-making power for vulnerable communities.

- **Public Recommendation (if any):** Strengthen the Program Goals by integrating equity, create a new program goal focus on equitable planning, and include public health into the Program Goals.
 - Change 1: Revised all Program Goals Staff revised each Program Goal to include an equity focus.
 - Change 2: Included "public health" in Program Goals Staff revised Goal #3
 and included "public health" as a climate risk intersection.
 - Change 3: New Program Goal Staff added the new Program Goal centered on equitable planning:
 - "Embed equity into the planning process, from project visioning through project evaluation, by increasing opportunities for shared decision-making, utilizing inclusive processes, and actively remedying



historic underinvestment by fairly distributing access to the benefits and privileges associated with community investment."

Key Feedback: Clarify the program timeline and funding round dates.

- **Public Recommendation (if any):** Clarify the funding round dates and include additional timeline information if possible.
 - Change 1: Augment program timeline In addition to extending the timeline, staff enhanced the clarity of the timeline, including anticipated webinar and funding notice dates.

II. A. ELIGIBLE APPLICANTS

Key Feedback: Applicants may want to pursue other state funding opportunities simultaneously with APGP, but it isn't clear whether that would be allowed.

- Public Recommendation (if any): None
 - Change 1: Added clarifying language Staff clarified language within the guidelines to encourage prospective applicants to pursue additional funding if necessary. Additionally, no match funding is required to pursue funding through the APGP.

Key Feedback: Public entities should have to work with community-based organizations on their proposed projects/plans to ensure longer-lasting collaboration and sustained progress in implementing the adaptation planning undertaken.

- Public Recommendation (if any): Design the APGP to require that public entities
 co-apply with community-based organizations. For example, remove the current
 requirement that public entities serve as lead or co-applicants and instead, require
 that community-based organizations serve as lead applicants or co-applicants to
 ensure that adaptation planning projects are responsive to the needs and voices of
 vulnerable communities.
 - Change 1: Revised "Public Entity Support" and "Community Partnership Support" sections - Staff edited the "Public Entity Support" and "Community Partnership Support" subsections to encourage public entities to partner with community-based organizations to invite community-based organizations to apply as lead applicants. Additionally. the "Community Partnership Support" now states that "Public entities should partner with a community-based organization to ensure that planning efforts are centering the needs of vulnerable communities."
 - Change 2: Letters of Support Staff augmented the application process to request that prospective Applicants' Letters of Supports include approval of the Applicant's community partnership.

Key Feedback: Encourage more community-based organizations to apply by providing greater flexibility in the Eligible Applicants section.



- **Public Recommendation (if any):** Explicitly include fiscally sponsored organizations as eligible entities.
 - Change 1: Include fiscally sponsored organizations Staff added the following statement, "Organizations, collaboratives, networks, and projects that are fiscally sponsored by any of the organizations, and those fiscally sponsored by academic institutions, are also eligible."

Key Feedback: The "Consistency with Existing Local, Regional, or Statewide Plans and Alignment with the Best Available Science" section should encourage new planning activities to advance APGP goals while avoiding maladaptation.

- Public Recommendation (if any): Augment this section to encourage new planning activities to align with local plans, goals and policies or seek to remedy inconsistences of local plans. Projects should, at a minimum, advance the goals and priorities of the APGP.
 - Change 1: Demonstrate best effort to advance local plan alignment Staff added the following statement, "If an Applicant does not demonstrate consistency with a jurisdiction's goals and policies, and its proposed project does not include an effort to update the goals and policies to remedy that inconsistency, the Applicant should explain the reasons in the application. The Applicant should also explain how its proposed project is still consistent with the goals and priorities of the APGP."

Key Feedback: Community Partnership section should consider including public water related agencies to enhance climate resiliency plans. Inclusion of these agencies would help address potential climate risks in climate resiliency plans.

- Public Recommendation (if any): Recommend including language that coalition (or community partnership) planning efforts include public water related agencies in their study area such as flood control, retail water agencies, water recycling agencies, groundwater management agencies, etc. explicitly include public water agencies including flood control agencies, retail water agencies, water recycling agencies, groundwater management agencies.
 - Change 1: Add public water agencies as eligible community partners Staff augmented the following statement, "Diverse partnerships will represent but are not limited to community-based organizations, public water related agencies in their study area (such as flood control), retail water agencies, water recycling agencies, groundwater management agencies, local health jurisdictions, local health departments, health equity-focused CBOs, vulnerable communities, representatives of disadvantaged communities, Tribes, educational institutions, local businesses, and other interest groups."

II: B. ELIGIBLE ACTIVITIES

Key Feedback: The APGP should encourage integrated (mitigation and adaptation) projects that address multiple impacts and provide multiple benefits. Communities need



help transitioning from broad climate adaptation plans into concrete projects. Projects should be integrated with multi-benefit water projects to be more effective.

- Public Recommendation (if any): Include more examples of eligible project types, such as water resource management, and include integrated regional water management (IRWM) plans.
 - Change 1: Include more eligible activity types Staff added more examples
 of eligible project types to the Eligible Activities section and continue to
 define eligible activities with a broad definition as to not dissuade water
 resource management activities.
 - Change 2: Explicitly included IRWM plans Staff added IRWM plans to the "Consistency with Existing Local, Regional, or Statewide Plans and Alignment with the Best Available Science" section.

II: B. INELIGIBLE ACTIVITIES

Key Feedback: Environmental studies such as California Environmental Quality Act (CEQA) or National Environmental Policy Act (NEPA) are normally required for project development and necessary to develop shovel-ready projects.

- **Public Recommendation (if any):** Recommend the APGP include CEQA/NEPA as eligible activities now or in Rounds 2 and 3.
 - Change 1: Consideration for future funding rounds The APGP cannot fund the development of CEQA or NEPA environmental documents at this time.

II: D. APPLICATION

Key Feedback: As written, the Work Plan assumed all projects would take 30 months which was confusing when the range of projects could take 12 months to upwards of 30 months as per the first paragraph under Program Summary.

- Public Recommendation (if any): Clarify the Work Plan requirement and associated timeline.
 - Change 1: Updated Work Plan Project Timeline Guidance Staff edited the Work Plan requirement by creating 1) a Workbook that includes both the Work Plan and the Budget and 2) a Work Plan template that specifies project end date to January 31st, 2026.

Key Feedback: Add Housing Element and Annual Progress Report (APR) compliance to threshold requirements for city and county applicants.

 Public Recommendation (if any): Recommend adding a sentence such as, "Cities and Counties with compliant Housing Elements and completed Annual Progress Reports." to the Threshold Requirements. Change 1: Added additional language regarding Housing Elements - Staff
included housing elements to "Consistency with Existing Local, Regional and
Statewide Plans" section.

Key Feedback: The application process is complicated and there is a very short window for developing a full proposal, including submitting letters of support during peak holiday time. The current combination of required application components and the tight timeline will create barriers for under resourced, under-capacitated communities, the very communities that stand to benefit the most from the APGP. Encourage the consideration of a more streamlined application process to accommodate more targeted planning activities that address specific needs rather than comprehensive adaptation plans. Lengthened deadline periods and early notifications about grant requirements, award results, and program status help communities gather and coordinate resources internally and between external partners.

- Public Recommendation (if any): Recommend simplifying the application and including a phased application process and give at least three months for the grant preparation period.
 - Change 1: Overhauled Application process Staff simplified the application process, replacing the complicated GRanTS portal process, which required unnecessary information, to a more familiar "drag and drop" style platform.
 - Change 2: Removed duplicative information To reduce confusion and unnecessary redundancies, staff removed duplicative information throughout the Application process, including the Threshold Requirements.
 - Change 3: Created "Request for Full Application Intent Survey" Staff created a two-phased application process that includes 1) an intent survey and 2) a full application. Staff intend to use Intent Survey data to support prospective applicants that either 1) do not submit full applications and may therefore require future assistance and/or 2) would benefit from being directed to other more relevant grant programs.
 - Change 4: Extended the Application window Application Staff also extended the application window to span almost 3 months.

Key Feedback: OPR should opt to use terms with more clearly defined metrics. For example, "Vulnerable Community" definition is broad so it seems like most communities could make an argument that they are vulnerable in some way. Also recommend the APGP use a data sets (or tools) that prospective applicants could use to determine if they would qualify as a Vulnerable Community.

Public Recommendation (if any): Recommend using "disadvantaged communities," as determined by CalEnviroScreen, and encourage OPR to replace the definition of "disadvantaged unincorporated communities" with the definition in Section 65302.10 of the California Government Code. Also recommend, when referencing "vulnerable communities," to specifically cite the statutory, legally codified definition in Section 71340 of the Public Resources Code.

- Change 1: Clarified terminology Staff adopted the above recommendations and more clearly defined vulnerable communities, disadvantaged communities, and disadvantaged unincorporated communities.
- Change 2: Updated the "Consideration of Vulnerable Communities" and "Funding Targets" sections - Staff updated the "Consideration of Vulnerable Communities" and "Funding Targets" sections to include specific data sets and data tools to help prospective applicants determine their status as vulnerable communities.

II: E. SCORING CRITERIA

Key Feedback: The APGP draft guidelines should take a clearer, more nuanced approach to scoring applications. Currently, the large increment values are vaguely described and lack detail regarding how an applicant can receive partial points. Create a clearer, more nuanced scoring process by clarifying how prospective projects will receive maximum or minimum points for each scoring criteria. A clearer scoring rubric can also serve as a filtering tool to help interested applicants gauge the suitability and competitiveness of their proposal – to inform their decision to apply and guide application development

- Public Recommendation (if any): Explicitly break down each scoring criteria into smaller components and add greater detail about what they are looking for. For example, the APGP could use precise rubrics that offer examples of how an applicant can fully maximize the number of points in a given section. Also recommend including a table that shows you will receive max pts if you do this and min pts if you do this.
 - Change 1: Added High/Medium/Low scoring Staff developed
 High/Medium/Low scoring ranges for each scoring criteria and included a
 point summary table to the beginning of the Scoring Criteria section for
 additional clarity.
 - Change 2: Added scoring criteria questions to the guidelines Each scoring criteria is broken down into High/Medium/Low scores with scoring descriptions and guiding questions to help applicants and application reviewers navigate the Application with maximum transparency.
 - Change 3: Developed the "Narrative Questions" component of the Application - Staff developed the Narrative Questions component of the Application to align with the above guiding questions.

Key Feedback: Center equity by prioritizing community partnerships that enable close engagement with communities most vulnerable to the impacts of climate change and the community-based organizations that either are based in or work directly with these communities. OPR should adjust throughout the program guidelines to emphasize this focus.

 Public Recommendation (if any): OPR should clarify that in addition to diverse representation, they will prioritize applicants who foster especially robust relationships with community-based partners and vulnerable communities.



- Change 1: Revised "Community Partnership" scoring criteria Staff developed the "Community Partnership" scoring criteria considerably, including community partnership rationale and a series of guiding questions.
- Public Recommendation (if any): OPR should offer greater detail about how
 applicants can meaningfully demonstrate commitment to equity to enable
 consistency and standardization in scoring criteria (i.e., decision-making structures,
 equitable distribution of grant funds, etc.). Including equity standards would provide
 a streamlined framework for how projects are evaluated.
 - Change 1: Developed equity standardization Staff adopted an equitycentered evaluation approach, embedding equity into each scoring criteria.
- Public Recommendation (if any): OPR should require that co-applicants describe how decision-making power will be shared between public entities and community partners to promote equitable partnerships and project outcomes.
 - Change 1: Developed equitable decision-making into the scoring criteria High scoring applications will need to both clearly describe how the
 partnership structure represents vulnerable communities and describe how
 the partnership will prioritize decision-making authority of vulnerable
 communities.
- Public Recommendation (if any): OPR should adjust the guidelines to prioritize
 applicants who state how they will distribute planning grant dollars amongst
 collaborative participants equitably.
 - Change 1: Enhanced "Budget" criteria High scoring application will now need to demonstrate how the proposed budget allocates resources across entities within the partnership in ways that align with organizational strengths, APGP equity goals, and in ways that adequately support community engagement activities.
- **Public Recommendation (if any):** Favorably rank applicants that create a dedicated funding set aside for small frontline community-based organizations.
 - No Change: The APGP is unable to develop programmatic set-asides for Round 1.

Key Feedback: Increase specificity for adaptive capacity criteria.

- Public Recommendation (if any): Make it clear that project proposals should focus on social and community resilience (i.e., not just the resilience of physical or built infrastructure).
 - Change 1: Combined "Community Need" and "Adaptive Capacity" sections Staff combined these sections to reduce redundancies within the scoring
 criteria.
- Public Recommendation (if any): Recommend revising the "Community Need" section to create greater accountability and flexibility.
 - Change 1: Added the above statement Staff edited this section to reflect the recommended language by including "what efforts have been made to meaningfully incorporate input from vulnerable communities..."



- Public Recommendation (if any): Clarify that in addition to scoring projects based on how well they promote adaptive capacity, OPR will also assess the ability of proposed projects to address sensitivity factors and reduce climate risk exposure.
 - o Change 1: Emphasized utilization of local data to reduce exposure and risk
- Public Recommendation (if any): Include examples of types of APGP projects that
 can increase this adaptive capacity, since social and community resilience can take
 many forms, such as emergency preparedness plans, access to transportation,
 resilience centers, and strong telecommunication networks.
 - Change 1: Included a link to Appendix D Updated Appendix D and to include additional resources and examples for prospective applicants to review.

Key Feedback: Regarding the "Co-Benefits" section, there are a myriad of multi-benefit solutions to address integrated climate resilience. Prescriptions should not be prioritized, but rather shaped in a flexible manner to secure as many solutions as possible. For example, a heat-vulnerable community may decide to prioritize a bus shelter over planting a tree for a number of valid practical or cultural reasons.

- **Public Recommendation (if any):** We recommend revising the fourth project objective to embed more flexibility.
 - Change 1: Removed prioritization of "natural and green infrastructure" Staff removed the implied prioritization of specific solutions, such as green
 infrastructure, and instead provided more flexibility and examples of potential
 co-beneficial solutions.

II: F. PROGRAM ELEMENTS

Key Feedback: The Work Plan should be simplified, and more resources should be provided to help applicants navigate it.

- Public Recommendation (if any): Recommend that OPR create an accompanying sample completed Work Plan document as well as a Work Plan template document in Excel so that applicants have access to a preformatted document to download and work directly out of.
 - Change 1: Created Work Plan template and sample Within the Application Workbook, prospective applicants can expect to find a Work Plan template as well as a sample completed Work Plan.

Key Feedback: OPR should offer personalized and continuous technical assistance to support applicants that are new to grant solicitation or adaptation planning processes. Dedicated technical assistance from the APGP application through program evaluation phase is critical to ensure applicants with limited capacity can successfully apply, equitably implement projects, and access ongoing funding to translate planning activities into implementation. Following the selection of grantees, it is recommended that that the APGP adopt a flexible approach to determining workshop topics and consult with grantees regarding the most effective delivery mechanism – such as in-person versus virtual.

- Public Recommendation (if any): Offer ongoing, personalized application technical assistance such as drop-in technical assistance office hours and the opportunity to meet 1:1 with OPR staff to discuss application questions throughout the entire application period.
 - Change 1: Adopted Office Hours Staff will be hosting Office Hours where prospective applicants can meet one-on-one with APGP staff.
 - Change 2: Allocating additional resources to technical assistance in future funding rounds - Third-party technical assistance is not currently available for Round 1 funding but, in subsequent rounds of APGP funding, APGP staff intend to allocate additional funding to provide third-party technical assistance providers to assist with application development, implementation, and evaluation.

Key Feedback: Expand technical assistance workshops and adjusting the program topics according to the interests and needs of grant recipients.

- Public Recommendation (if any): Recommend working directly with expert organizations to develops workshops on how to conduct equitable community engagement and community driven climate resilience planning.
 - Change 1: Added Resources to Appendix D and investigating additional workshop opportunities - Staff enhanced the resources available in Appendix D and are committed to exploring conversations with subject matter experts dependent on the needs of grantees.

Key Feedback: The APGP should specify the types of technical assistance available during implementation to help applicants understand what they should or should not account for as part of their application budget and work plan. Furthermore, the APGP facilitate implementation funding for grantees.

- Public Recommendation (if any): Recommend building out the Implementation Technical Assistance section to highlight what specific types of implementation technical assistance OPR plans to offer awardees.
 - Change 1: Developed Technical Assistance section Staff edited the Technical Assistance section to highlight specific types of technical assistance planned for awardees.
- Public Recommendation (if any): Recommend offering direct technical assistance
 to grant recipients seeking implementation dollars to implement their adaptation
 plans. This might entail actively tracking and sharing relevant grant opportunities,
 helping small city agencies or community-based organizations access the funding
 needed to apply for implementation grants, and more.
 - Change 1: Tracking and sharing relevant grant opportunities Staff will be actively monitoring projects with the intention to support their planning efforts and whenever possible, to share relevant grant opportunities.

III: A. FUND AVAILABILITY

Key Feedback: The Eligible Costs and Ineligible Costs associated with funding participant activities could use clarification. More guidance and flexibility on the form that participant compensation can take would be helpful and appreciated.

- **Public Recommendation (if any):** Recommend to better distinguish between the Eligible Cost of "participant compensation" and the Ineligible Cost of "direct cash benefits or subsidies to participants."
 - Change 1: Clarified Eligible Costs for participants Staff added the following language, "Community participant compensation that is an exchange of payment for services rendered in the development of outreach or work products, and appropriately documented with deliverables such as sign-in sheets or written surveys. Subcontractors and consultants should be qualified to provide services. It is the responsibility of the lead Applicant to comply with all applicable laws."

Key Feedback: Separate funding ranges for single-applicant applications and partner applications are confusing. Furthermore, having budget percentage requirements, such as the 3-15% allocation for Peer-to-Peer Learning, is confusing especially without a budget template.

- Public Recommendation (if any): None.
 - Change 1: Clarified Funding amounts and percentage allocation Staff created a singular funding range (from \$150,000-\$600,000) for all Applicants and reduced percentage allocation requirements except for Indirect Administrative Costs (20%).

Key Feedback: Including rural communities as Funding Targets is great – many rural communities steward natural resources and are particularly vulnerable to the effects of climate change. For these reasons, investing in their resilience is critical to building resilience throughout the state. However, the definition of rural communities is vague. Furthermore, Funding Target communities frequently experience a difficult time deciding what to and what not to apply for given their limited staff capacity.

- **Public Recommendation (if any):** Recommend adding further clarification on how rural communities will be defined.
 - Change 1: Adopted economically disadvantaged rural communities (EDRC) terminology – Staff adopted the federally-recognized term, EDRC, to best define vulnerable rural communities and hopefully streamline those communities into federal grant opportunities.
 - Change 2: Expanding outreach efforts Staff acknowledge the additional difficulty that Funding Target communities experience when looking for, and applying to, grant programs. For these reasons the APGP staff are exploring additional opportunities to share the funding opportunity, create more flexible

application timelines, and create more accessible application methods, such as video and mixed-media applications.

IV: APPENDIX B: GLOSSARY AND ACRONYMS

Key Feedback: Suggest including other terms introduced in the APGP Guidelines, such as "community partnership agreement," as well as clearer definitions of how the APGP defines "rural" for the purpose of the funding target.

- **Public Recommendation (if any):** Recommend adding "community partnership agreement," "rural," and other terms that might help clarify the funding targets.
 - Change 1: Revised Glossary Staff revised the Glossary to include any new introduced term, including several terms from our federal partners at FEMA to help clarify the Funding Target specifically.

To stay involved of future work and releases, interested parties are encouraged to <u>sign-up</u> <u>for the newsletter</u> or check the <u>Program website</u>. Questions will always be accepted in writing by emailing program staff Abby Edwards (<u>abby.edwards@opr.ca.gov</u>), Brandon Harrell (<u>brandon.harrell@opr.ca.gov</u>) or the general email (<u>icarp.grants@opr.ca.gov</u>).