



December 15, 2017

Strategic Growth Council  
Attn: Elizabeth Grassi  
1400 Tenth Street  
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*Via email submission to [research@sgc.ca.gov](mailto:research@sgc.ca.gov)*

**RE: Climate Change Research Program FY 2017-2018 Draft Research Investment Plan**

Dear Strategic Growth Council:

On behalf of the undersigned, the Greenlining Institute (“Greenlining”) submits these joint comments. We appreciate the opportunity to provide feedback on the Strategic Growth Council’s (“SGC”) Climate Change Research Program Draft Research Investment Plan. We acknowledge and appreciate all the hard work that SGC staff put into turning out a draft plan on a short timeline.

We would like to commend and uplift the program’s emphasis on low-income and disadvantaged communities. We also commend SGC for modeling meaningful engagement through the many public participation opportunities (hosting webinars and public workshops, accepting public comments, and regularly communicating with stakeholders).

Greenlining advocates for an “Equity In – Equity Out” approach. Here, “Equity In” refers to equity built into the program itself, including development, implementation, and program operation. “Equity Out” means research projects directly benefit low-income, disadvantaged, and vulnerable communities. Our joint comments will reflect this approach.

**We provide a summary of the following recommendations to enhance the final Research Investment Plan:**

- Expand the eligibility list to include non-profits and community-based organizations
- Provide more background on the need for equitable outcomes
- Require partnerships with community-based organizations
- Implement a targeted geographic approach to include all California regions
- Explain, and provide actionable guidance for, meaningful community engagement
- Clarify the hierarchy of the research priorities and embed equity into all four
- Clarify which health-outcome related research is eligible
- Establish diversity targets within the program structure
- Establish metrics within the program structure
- Use a scoring system to determine the level of DAC benefits in each proposal

## I. Introduction

*Expand the eligibility list to include non-profits and community-based organizations*

Our comments will correspond to the order of sections in the Draft Investment Plan. We would first like to draw your attention to page 1 of the Investment Plan: “Statutory language directs that the SGC Climate Change Research program will: ... Be open to eligible institutions, *including* the University of California, California State University, federally-funded national laboratories, and private, non-profit colleges and universities.” (emphasis added).

We interpret the statutory mandate as an “including, but not limited to,” meaning that the eligible list in the Investment Plan can be expanded to include additional institutions, such as non-profits and community-based organizations (CBOs) that offer suitable proposals. Since one of the goals of the Climate Change Research program (on page 1) is to “advance research to support low-income and disadvantaged communities”, it is necessary for non-profits and CBOs that serve these communities to be included in the eligible list. These entities understand the specific challenges their communities face, and can help ensure the research meaningfully supports those communities.

We encourage SGC to expand the eligibility list, and we also we heard several public comments to that effect at Oakland’s November 27, 2017 Public Workshop.

If expanding the eligibility list is not possible, then we recommend including instructions and guidelines that clearly explain how a non-profit (or other unlisted institution) can be a *sub-applicant*, including the parameters of how that sub-applicant may engage in a project. In this situation, we recommend adopting a structure similar to the Collaborative Stakeholder Structure used in the Transformative Climate Communities (“TCC”) Program (see page 7 of the [TCC Final Guidelines](#)).

*Provide more background on the need for equitable outcomes*

On page 1: “The goal of the Climate Change Research program is to advance research to support low-income and disadvantaged communities, including equitable outcomes in the implementation of the State’s climate change policies and investments.”

We recommend expanding this paragraph and including more background information on California’s climate policy and investments, and why the research program must prioritize and support low-income and disadvantaged communities. Program applicants will benefit from additional information on [climate justice principles](#), and applicants who have a better understanding of equity will submit applications with a stronger focus on equity.

We recommend the following language to provide a framing for California’s climate investments and the State’s commitment to investing in low-income and disadvantaged communities:

California has modeled an unprecedented statewide effort to reduce greenhouse gas (GHG) emissions. Several historic policies are helping California lead the nation

in our fight against climate change. The Global Warming Solutions Act of 2006 (AB 32) commits California towards reducing greenhouse gas emissions to 1990 levels by 2020. SB 535 (de León, 2012) directed revenue generated by AB 32 into disadvantaged communities in order to invest in the communities most impacted by the cumulative impacts of poverty and pollution. AB 1550 (Gomez, 2016) improves SB 535 by additionally directing funds to projects that directly benefit low-income households and communities. AB 1550 reflects the need to invest in overburdened communities hit first and worst by the adverse impacts of pollution and climate change. It also addresses the vulnerability of low-income households who spend a larger share of their income on basic necessities – including, water, electricity, natural gas, and transportation – than higher-income households. By making a greater investment in California’s environmentally and socioeconomically disadvantaged populations statewide, there is potential to yield significant climate, public health, and cost-saving benefits for these families.

In addition to the suggested language above, we recommend SGC refer to page 7 of the [TCC Final Guidelines](#), and the paragraph titled “Focus on Disadvantaged Communities.” This is another great place to start for language to address our recommendation.

## II. Program Goals

We support the stated goals of the research program, particularly Program Goals numbers 2, 4 and 5:

- Program Goal 2: Advance research to support low-income and disadvantaged communities, and advance equitable outcomes in the implementation of the State’s climate change policies and investments.
- Program Goal 4: Prioritize outcome-based research linked to practical climate action.
- Program Goal 5: Model meaningful engagement with the research community, community-based organizations and other stakeholders at all stages of the program to ensure relevance and utility of research process, projects, and results.

### *Require partnerships with community-based organizations*

Program Goal 2 on page 2 states: “Research projects and partnerships *should* be designed to address and facilitate achieving climate outcomes in low-income and disadvantaged communities.” (emphasis added). We strongly recommend revising the “should” to a “must.” To meet the program’s stated goal of advancing research to support low-income and disadvantaged communities, SGC should *require* that all applicants design their proposals to address and achieve outcomes in those communities.<sup>1</sup>

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<sup>1</sup> Note that on page 7, under Section V Program Administration and Application Instructions, Subsection A. Threshold Requirements, SGC uses “must”: “All applicants *must* also discuss how the research will benefit low-income and disadvantaged communities” (emphasis added). We recommend using “must” throughout.

*Implement a targeted geographic approach to include all California regions*

Next, under Program Goal 4 on page 2: “Outcome-based research will make a direct connection to enabling climate actions. This could include projects that support on-the-ground action in the community or region.”

During the November 27, 2017 Public Workshop in Oakland, Greenlining heard a comment suggesting that SGC consider geographic diversity in the grants it provides. Geographic diversity would help ensure that the research funds address climate change issues in *all* regions of California, and would also prevent a significant portion of funds going to the same issue such as sea level rise, which does not impact all regions in the state. We agree with this suggestion and encourage SGC to adopt a targeted geographic approach. We suggest SGC work to fund a portfolio of projects that are representative of and address climate issues in all regions of the state.

*Explain, and provide actionable guidance for, community engagement*

We appreciate the proposed goal of facilitating meaningful engagement among the research community, community-based organizations, and other stakeholders (Program Goal 5 on page 3). To facilitate meaningful engagement with CBOs, we recommend that SGC include a detailed explanation of what community engagement means, as well as actionable guidance on how to meaningfully engage.

From the public workshops, we understand that SGC would like additional guidance on what a community engagement plan should look like and include, including metrics to track success.

To address that request, we point to the section titled “Ensure Community Engagement” on page 13-14 of the [TCC Final Guidelines](#)<sup>2</sup> and strongly recommend that SGC include similar guidance here. The following suggested language is borrowed from that section:

- Applicants must involve residents from the Project Area and key stakeholders in all phases of research proposal development and implementation.
- All proposals should be designed to meet needs that have been and will be further identified by Project Area residents through a documented outreach and engagement process.
- Applicants must use methods of engagement to facilitate participation of community residents, including ensuring translation of meetings and materials, scheduling of meetings at times that are convenient to community members, and engaging community members in information gathering as well as outreach.

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<sup>2</sup> Table 4: Recommended Activities to Ensure Meaningful Community Engagement, page 14 of TCC Final Guidelines, is also a great place to start.

- Research proposals must include a Community Engagement Plan that describes methods that will be used to engage residents and key stakeholders during proposal development and implementation. Priority will be given to proposals that include a robust combination of activities to engage community stakeholders. The Community Engagement Plan should include, at a minimum:
  - Description of key stakeholders and residents, including any existing neighborhood organizations or advisory councils serving the Project Area
  - The process to be used to identify the needs of residents and other stakeholders during the research proposal development phase
  - How the public will be informed of proposal and research progress
  - Description and timeline of proposed community engagement activities

Lastly, we recommend that SGC include specific metrics to track and measure community engagement. We suggest referring to the Scoring Criteria for Community Engagement on page 29 of the [TCC Final Guidelines](#) and strongly recommend that SGC include similar criteria here. The following suggested language is borrowed from that section:

- Applicant(s) have established work history and/or experience working with one or more of the following areas: disadvantaged communities, climate investments, community and economic development, environmental, and public health issues.
- Where applicable, a sub-applicant structure is comprised of a diverse representation of residents and key stakeholders.
- Where applicable, a signed Memorandum of Understanding (MOU) lays out clear roles, responsibilities and relationships among the applicants; clear decision-making processes; plan for accountability; engagement of Project Area/Topic residents and key stakeholders
- The Community Engagement Plan discusses how applicants propose to inform the public of implementation progress and updates on program implementation.

### **III. Research Priorities**

*Clarify the hierarchy of the research priorities and embed equity into all four*

We would like for SGC to provide clarification on whether the priorities are listed in an order that will impact grant awards. Will proposals that address Research Priority 1 have preference over all others?

If there is a hierarchical preference that will impact proposal evaluations and grant awards, we recommend the following hierarchy:<sup>3</sup>

1. Supporting and Protecting Vulnerable Communities from the Impacts of Climate Change
2. Accelerating and Supporting Transitions to Climate Smart Communities (moved up from 4)
3. Increasing Data Accessibility and Planning Support for Local and Regional Climate Change Planning
4. Integrating Land Use, Conservation, and Management into California’s Climate Change Programs (moved down from 2)

We recommend this hierarchy because “Supporting and Protecting Vulnerable Communities from the Impacts of Climate Change” and “Accelerating and Supporting Transitions to Climate Smart Communities” have strong equity components. We strongly encourage SGC to include equity-specific language in the remaining two Research Priorities to strengthen their ability to provide equitable outcome per Program Goal 2.

Program Goal 2 also states that a goal of the program is “to advance research to support low-income and disadvantaged communities.” Thus, there needs to be a stronger connection showing how “Increasing Data Accessibility and Planning Support for Local and Regional Climate Change Planning” and “Integrating Land Use, Conservation, and Management into California’s Climate Change Programs” will directly benefit those communities.

We offer the following recommendations to strengthen all priorities:

*Supporting and Protecting Vulnerable Communities from the Impacts of Climate Change*

To protect vulnerable communities, there is a need to define vulnerability through an approach that identifies regions and areas that will disproportionately suffer from climate change impacts. There is a need for research to develop such a tool that can integrate projects, climate impacts, climate risks, and socioeconomic vulnerability. The research needed for this is addressed through the research topic 2) on page 4: “What tools *are available* to identify potential “hot spots” of observed climate change, projected climate risk, and population vulnerability? ...” (emphasis added)

We recommend amending this topic to “What tools are available *and/or need to be developed* to identify potential impacts of observed climate change, projected climate risk, and population vulnerability?” This language will open up the opportunity for the research to contribute to the creation of a specific tool to capture and visualize data on climate risk and community vulnerabilities in California.

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<sup>3</sup> If there is no hierarchical preference, we recommend clarification to that effect in the final version.

## *Accelerating and Supporting Transitions to Climate Smart Communities*

We suggest the following textual edits to page 6:

“Additional research is needed to understand the ~~barriers and challenges~~ **barriers, challenges, and possible solutions** to community transformation and its ~~that is~~ **that is** just and equitable. ~~distribution.~~ This can include work to understand ~~implementation of~~ **challenges to scaling** low-carbon technologies **while prioritizing and targeting the State’s most vulnerable communities.** ~~, but also~~ **This research could also look at the** uptake of alternative modes of transportation or clean energy. Furthermore, research is needed to better understand and quantify the effectiveness of some local-scale climate interventions.

***Research performed under this priority should be guided by a social equity lens to ensure benefits reach individuals and communities that need them most and ensure that burdens and negative externalities do not disproportionately harm vulnerable individual and communities that can perpetuate and reinforce systemic inequities in planning processes and the composition of cities.***

Specific research topics include the following:

1) What are the environmental quality, economic, and/or social **equity** implications of innovative mobility strategies (e.g., pricing strategies, road charge strategies, reduced parking requirements, or streamlining of permits for electric vehicle charging)? ***And how can we ensure that the benefits of these strategies help low-income individuals the most?***”

## *Integrating Land Use, Conservation, and Management into California’s Climate Change Programs*

We encourage SGC to clearly explain how this research priority will support low-income and disadvantaged communities. If equity is built into all four research priorities, and appropriately explained here in the guidelines, then applicants will have a better understanding of equity and an easier time discussing it within their proposals. We suggest the following addition to the description on page 4:

Research performed under this priority should be guided by a social equity lens to ensure benefits reach individuals and communities that need them the most, and to ensure that burdens and negative externalities do not disproportionately harm vulnerable individual and communities, nor perpetuate and reinforce systemic inequities in conservation processes and land-use decisions.

## *Increasing Data Accessibility and Planning Support for Local and Regional Climate Change Planning*

We encourage SGC to clearly explain how this research priority will support low-income and disadvantaged communities. If equity is built into all four research priorities, and

appropriately explained here in the guidelines, then applicants will have a better understanding of equity and an easier time discussing it within their proposals. We suggest the following addition to the description on page 5:

Research performed under this priority should be guided by a social equity lens to ensure benefits reach individuals and communities that need them most, and to ensure that burdens and negative externalities do not disproportionately harm vulnerable individual and communities, nor perpetuate and reinforce systemic inequities in climate planning processes and decisions.

#### *Clarify which health-outcome related research is eligible*

It is our understanding that health outcome related research is eligible for the program (i.e. asthma impacts from climate change). We encourage SGC to provide clarification on what is and is not eligible in researching climate change's health outcomes.

#### *Require partnerships with community-based organizations*

On page 4: "Partnership with community groups *should* be a key component of research to address vulnerable and disadvantaged community needs for climate resilience[.]" (emphasis added). We recommend revising the "should" to a "must." To meet SGC's stated goals of (a) modeling meaningful engagement and (b) advancing research to support DACs, the undersigned recommend that SGC *require* all applicants to partner with community groups to ensure meaningful engagement with communities, and to ensure research is responsive to anticipated community impacts.

## **IV. Program Structure**

On page 6: "Research Partnership Grants provide an opportunity to develop and model collaborative research partnerships to achieve SGC's goals. The proposal *should* include a model for State-Academic collaboration and engagement with community-based organizations or other stakeholders in the research process." (emphasis added). We recommend revising the "should" to a "must." To meet your stated goal of modeling meaningful engagement, we encourage you to *require* that all applicants design their proposals to include a model for collaboration and engagement with CBOs and other stakeholders.

#### *Establish diversity targets within the program structure*

To achieve the "Equity In" goal discussed above, we recommend SGC:

- Establish a diversity target for researchers and institutions, including geographic and demographic diversity
- Promote diversity in the size of the institutions awarded (including a focus on local/small/diversely-owned institutions, small college campuses, and trade schools) to ensure a variety of research perspectives are included in the program



### *Establish metrics within the program structure*

Metrics are important to stakeholders for various reasons, and should be based on program goals. Baseline metrics will allow SGC to track whether the intended goals of the program are met, to share process and implementation information, and to provide a more robust picture of the program's successes and shortcomings.

In addition to the metrics discussed on page 2 above, we recommend starting with the following metrics as borrowed and adapted from University of Southern California's Program for Environmental and Regional Equity:<sup>4</sup>

- Does the program prioritize projects that support low-income and disadvantaged communities? Does the program advance equitable outcomes? Are existing inequities prioritized in a way that improve economic and health opportunities?
- Does the program involve partnership at every step of the process? Does the program center the perspective of low-income and disadvantaged communities? Does the community engagement support meaningful community participation and decision-making?
- Does the program take future considerations into account by leveraging funding for long-term community health and organization capacity? Does the program mitigate future harms? Does the program incorporate metrics and evaluation to promote adaptable and effective implementation?

## **V. Program Administration and Application Instructions**

*Use a scoring system to determine the level of DAC benefits in each proposal*

On page 7: "All applicants must also discuss how the research will benefit low-income or disadvantaged communities." We fully support this threshold requirement. We recommend strengthening its intent by prioritizing direct benefits over trickle-down benefits.

It can be challenging to account for the specific needs and challenges that low-income or disadvantaged communities face. Nevertheless, research proposals that claim to benefit all communities, without specific description of how they will benefit low-income or disadvantaged communities, may not be relevant or useful to those communities. Thus, we recommend prioritizing research that *directly* benefits residents located in low-income, disadvantaged and vulnerable communities, and not assume, for example, that projects will benefit a disadvantaged community simply because of its location within the same geographic location as a disadvantaged community.

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<sup>4</sup> "Measures Matter: Ensuring Equitable Implementation of Los Angeles County Measures M & A" <http://dornsife.usc.edu/perc/measures-matter-la/> (accessed 12/15/2017).

Thus, the threshold requirement should be expanded to require research agendas that are meaningful and explicitly tied to community needs. Requiring partnership with CBOs and organizations that directly serve DACs is another great avenue to identify the specific community needs.

To strengthen this threshold requirement, we suggest using a scoring system like the one below. This can help determine and rank each proposal's direct benefits to low-income or disadvantaged communities (DACs). If a scoring system is adopted, we also recommend including the system in the guidelines to allow applicants to see how their proposal will be evaluated.

SCORING SYSTEM FOR PROJECT BENEFITS TO DAC/LIC

5 – EXCEPTIONAL.

Describes strong, quantifiable benefit to disadvantaged/low-income community; objective is tightly linked to DAC; high degree of intentionality to addressing DAC issues

4 – GOOD.

Project will more than likely benefit a disadvantaged and/or low-income community, project objective is primarily to bring benefits to a disadvantaged/low income community

3 – AVERAGE.

Project may benefit a disadvantaged/low-income community, any benefits would likely be a secondary objective for project

2 - BELOW AVERAGE.

Project will more than likely not benefit a disadvantaged/low-income community, any benefits are not a secondary objective for project but may be incidental to project

1 – POOR.

Project clearly will not benefit a disadvantaged/low income community.

## Conclusion

We commend SGC's progress on developing the Climate Change Research program. With this program, SGC has a unique opportunity to normalize and prioritize equity in climate research. We greatly appreciate the opportunity to provide comment and we look forward to engaging further on this research program.

Sincerely,

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