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Wildlife Conservation Board
1416 9th Street, Room 1266
Sacramento, CA 95814
Via email submission to climateWCB@wildlife.ca.gov

RE: Climate Adaptation and Resiliency Program Guidelines

Dear Wildlife Conservation Board Staff:

The Greenlining Institute (“Greenlining”) greatly appreciates the opportunity to provide feedback on the Wildlife Conservation Board’s (“WCB”) Climate Adaptation and Resiliency Program Guidelines.

The Greenlining Institute is a racial and economic justice nonprofit working to advance economic opportunity and empowerment for people of color through advocacy, community and coalition building, research, and leadership development. Greenlining is committed to fighting systemic and explicit disinvestment in communities of color resulting from “redlining” practices. Our comments will focus on ways in which the draft Program Guidelines can incorporate equity considerations into the foundation of the program.

With this allocation of GGRF funds, the WCB has a unique opportunity to provide environmental benefits in the California communities that need them the most. To achieve enduring benefits per AB 109, it is vital to engage with and learn from our state’s impacted communities. Greenlining commends WCB for acknowledging this and including the “Community/Stakeholder Support” category under the draft Review Criteria:

Community Support and Collaboration - The extent to which a proposal demonstrates that the project has broad-based public and institutional support at the local, regional, or larger scale and that the local community and other stakeholders are engaged in project delivery.

Recommendation: Consider expanding the *Community Support and Collaboration* criteria to include a detailed and robust section on meaningful community engagement

Adaptation and resilience efforts for wildlife populations requires an intersection with *people populations*, including tribal communities and rural, working communities living in and around conservation sites. Working with tribes and engaging native peoples around ecological restoration and habitat preservation is critical, as there could be potential loss of cultural resources for those communities. Environmental justice requires addressing these concerns and the needs of disadvantaged communities. The communities that are most burdened by the impacts of climate change stand to benefit the most from adaptation and resilience co-benefits.

Thus, meaningful community engagement is necessary to effectively consider these concerns. Collaboration is also necessary to other avoid negative consequences (such as displacement) which could inadvertently increase vulnerability for frontline populations.

To strengthen the community support and collaboration process, Greenlining recommends that WCB add a section in the Program Guidelines to incorporate robust guidance on meaningful community engagement. Greenlining points to the section titled “Ensure Community Engagement” on page 13-14 of the [Transformative Climate Communities Program Final Guidelines](#)¹ and suggests that WCB include similar guidance. The following suggested draft language was borrowed from that section:

- Applicants must involve residents from the Project Area and key stakeholders in all phases of grant proposal development and implementation.
- All proposals should be designed to meet needs that have been and will be further identified by Project Area stakeholders through a documented outreach and engagement process
- Applicants must use methods of engagement to facilitate participation of local 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.
- Grant 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 proposal development phase
 - How the public will be informed of proposal and project progress
 - Description and timeline of proposed community engagement activities

Recommendation: Consider economic impacts of funding decisions and maximize social equity by prioritizing and promoting economic opportunity for those most in need

To the extent possible that project activities will facilitate economic opportunities, Greenlining strongly encourages WCB to prioritize proposals that increase training, employment and economic development opportunities among communities with barriers to employment.

¹ Table 4: Recommended Activities to Ensure Meaningful Community Engagement, page 14 of TCC Final Guidelines, is also a great place to start.

We urge WCB to incorporate “High Road” workforce development values that focus on a commitment to quality, quantity, and access, and we recommend using the following questions in guiding this effort:

- How can you ensure jobs funded by this program pay good wages, provide benefits, and provide well-articulated career ladders (quality)?
- Where are the opportunities that will go to a large enough scale to be meaningful (quantity)?
- And how can you ensure that those jobs are attainable for people with barriers to employment (access)?

WCB has an opportunity to investigate ways to create economic opportunity, including contracting with women- and diverse-owned businesses where available. Greenlining encourages WCB to prioritize proposals that advance a “just transition” and further enhance community resilience. Loss of habitat through climate change impacts can have severe consequences for California communities (such as job loss in rural communities). We encourage WCB to consider the economic impacts of conservation strategies and overall funding decisions.

In sum, Greenlining recommends that WCB revise the Program Guidelines to place a high priority on grant proposals that:

- Have robust recruiting and hiring policies targeting disadvantaged and low-income communities;
- Provide high-quality jobs;
- Have robust supplier-diversity procurement goals and;
- Partner with or provide support to workforce development programs aimed at impacted communities.

Recommendation: Prioritize technical assistance grants for efforts that improve rural-urban coordination on climate change adaptation

We encourage WCB to prioritize technical assistance grants within the Program Guidelines. These funds are a unique opportunity to facilitate access for communities that face barriers or challenges to accessing the resiliency planning processes for natural and working lands. Technical assistance grants for land managers to support efforts that improve rural-urban coordination will help facilitate access for urban and disadvantaged communities.

AB 109 states that the funds “may also be used to develop and implement natural and working lands adaptation and resiliency planning that prioritizes the conservation and management of natural and working lands, technical assistance for natural and working land managers, *and* efforts that improve rural-urban coordination on climate change adaptation.” AB 109 (2017) (emphasis added).

Greenlining recognizes that WCB has interpreted the above provision as allowing for planning grants, implementation grants - and separately - **technical assistance grants for land**

managers *and* efforts that improve rural-urban coordination. However, the draft Program Guidelines indicate that grants for technical assistance can be for “natural and working land managers” *or* to “support efforts that improve rural-urban coordination on climate change adaptation.” Greenlining would like to point out that AB 109 includes an *and* – not an *or*. Thus, we urge WCB to revise the draft Program Guidelines on page 2 to read as follows:

Technical Assistance

Grants may be used to provide guidance and technical assistance to natural and working land managers to support efforts that improve rural-urban coordination on climate change adaptation, and that result in or lead to direct and measurable climate change adaptation benefits.

We encourage WCB to adopt this interpretation to ensure rural-urban coordination is prioritized in all technical assistance grants. The current lack of coordination between urban and rural areas makes it difficult for urban and disadvantaged communities to participate in adaptation and resiliency planning for natural and working lands. This lack of voices becomes a barrier to achieving enduring benefits with the greatest impact – that is, those which take into account both urban and rural considerations.

Lastly, we recommend that WCB provide clarification on what it means *to support efforts that improve rural-urban coordination on climate change adaptation*. Program Guidelines which clearly explain what this means will facilitate stronger proposals and projects.

Greenlining appreciates the opportunity to submit these comments and we would welcome the opportunity to discuss our comments further.

Sincerely,

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