

March 14, 2022

Director Lynn von Koch-Liebert
California Strategic Growth Council
1400 Tenth Street
Sacramento, CA 95814

RE: Draft Round 1 Regional Climate Collaboratives Program Guidelines

Dear Director von Koch-Liebert:

Thank you for the opportunity to provide comment on the Strategic Growth Council's (SGC) Draft Round 1 Regional Climate Collaboratives (RCC) Program Guidelines. The Guidelines build upon SGC's strong track record and provide a considered framework and program design for building out collaboratives at the local level. As co-sponsors of SB 1072 (Leyva, 2018), we are appreciative and excited to see this community capacity building program finally come to life.¹

Round 1 of the RCC program will offer the State an important opportunity to test and learn what is needed at both the place-based and structural scales to build the capacity of under-resourced communities. Capacity building is not a short-term intervention, but a long-term investment in strengthening skills, leadership and partnerships so that under-resourced communities can meet their own needs. We urge SGC to use this opportunity to learn, develop a capacity building praxis, and commit to a long-term capacity building strategy for under-resourced communities across California.

We offer the following recommendations to support capacity building for under-resourced neighborhoods and operationalizing equitable collaborative governance.

Recommendations:

1. Increase Eligible Grant Award Size to at Least \$1.5 Million
2. Require Community Climate Solutions Inventory as a Project Deliverable, and Develop a Mechanism to Connect Project Ideas to Funding Sources
3. Center Community Capacity Building, Not Regional Coordination
4. Require & Fund External Learning Evaluation to Calibrate Equitable Processes
5. Tie Evaluation Learnings to Yearly Grant Contracts
6. Scoring Criteria Priorities: Project Need, Program Objectives & Strategies, and the Collaborative Stakeholder Structure

¹ Regional climate collaboratives program: technical assistance, Cal. Public Resources Code § 71131(2018).
https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB1072

RECOMMENDATIONS

1. Increase Eligible Grant Award Size to at Least \$1.5 Million

We strongly recommend that SGC increase the eligible grant award size from the current range of \$500,000 to \$1 million, to at least up to \$1.5 million. Based on our experiences delivering technical assistance and building capacity at the local level, we believe that a higher grant award size would be necessary for some, if not many, collaboratives to staff a full team. Providing collaboratives with the requisite capacity and staffing is critical to sustaining equitable partnerships and comprehensive program delivery.

Since 2016, the Greenlining Institute (GLI) has supported South Stockton stakeholders in successfully achieving a Transformative Climate Communities Planning and Implementation Grant. Altogether, our work in Stockton costs approximately \$150,000-\$200,000 annually. Primary expenses include:

- Staff time. I am the primary project manager for GLI's work in Stockton and have also relied on the assistance of my director. Over the years, my staff time has been directed towards the following activities: outreach and education, partnership development, facilitation and convening, project management, policy and technical assistance, grant writing and strategy development.
- Additional expenses, such as: pass-through stipends to our community-based partners, travel and meeting costs, consultants and administrative expenses.

Based on these experiences and rates, a collaborative staffed by three staff members would cost approximately \$450,000 annually or \$1.35 million over a three-year grant period. Moreover, we anticipate that the RCC will incur significant costs that we did not encounter: 3-5% for peer-to-peer learning, 3-5% for evaluation, and likely a much higher degree of administrative expenses to manage the Collaborative Stakeholder Structure.

In addition to our direct experiences, we have observed that collaborative grant processes that utilize more staff are able to function much more effectively and efficiently. The Stockton community has been the recipient of several State grants, including TCC, a 617 Community Air Grant and the Sustainable Transportation Equity Project (STEP) grant:

- The TCC project has the least amount of Grantee staffing attached, relying on 1 FTE staff member plus two Lead for America Fellows. The City of Stockton has struggled to stand up their Collaborative Stakeholder Structure, manage administrative processes or support their partners in project delivery.
- The lead grantees for 617 and the STEP program (respectively, the San Joaquin Valley Air Pollution Control District and the San Joaquin Council of Governments), have been

able to leverage more internal staffing to manage those projects. As a result, both processes have made faster progress.

We therefore recommend that a higher threshold of at least \$1.5 million would be necessary for collaboratives to meaningfully operationalize capacity building, partnership development and technical assistance services.

2. Require Community Climate Solutions Inventory as a Project Deliverable, and Develop a Mechanism to Connect Project Ideas to Funding Sources

While one of RCC's core Program Objectives is to "develop actionable plans and projects," this objective lacks a corresponding required Project Deliverable. We recommend that SGC require RCC communities to develop an inventory of Community Climate Solutions.² Creating such an inventory should be a natural outgrowth of this program objective.

Moreover, to make the inventory an actionable document, we recommend that SGC develop a mechanism to connect project ideas directly to State funding sources and policymaking. RCC communities will be developing community-vetted and project-ready climate mitigation and adaptation strategies. This intensive preparatory work from visioning to technical project development will only be worthwhile if communities are successful in significantly achieving public investment.

As communities are getting ready on the ground, the State must concurrently be building readiness to connect community-vetted and project-ready strategies with available resources, and make policymaking responsive to California's most under-resourced communities. We offer a few suggestions for how this might look:

- State grants can offer additional points for Community Climate Solutions projects in their scoring criteria.
- Collaboratives can support under-resourced communities in identifying creative funding sources for Community Climate Solutions that don't fit into existing investment types.
- SGC can develop an interactive database of Community Climate Solutions from across the state, to share with State agencies and the SGC Council.
- SGC can conduct an annual evaluation of the successes and gaps of the Community Climate Solutions Inventories in securing State funding.

² Other name ideas: Community Plans for Climate Action; Community Blueprint for Climate Action; Our Communities, Our Climate Solutions

- This evaluation would analyze the effectiveness of technical assistance provided, identify patterns in successful project proposals, investigate gaps in project funding and offer recommendations for improvement.
- This evaluation could be shared with the SGC Council to inform future programmatic and investment development. For example, if the evaluation identified that many RCC communities developed actionable projects but that those projects were not successful in achieving funding, State agencies should reconsider their scoring criteria or technical assistance offerings. If those projects lacked a clear funding source, the State should develop new funding streams to meet community needs.
- We model this evaluation concept on the SB 350 Barriers Report, which required the California Energy Commission to examine barriers that low-income and disadvantaged communities face when adopting clean energy measures.³

3. Center Community Capacity Building, Not Regional Coordination

Throughout the Guidelines, we notice inconsistencies regarding the primary purpose and associated activities of the RCC program. The Program Objectives start by emphasizing that the purpose of the RCC is to support capacity building for under-resourced communities. At various other points, however, the Guidelines focus on regional coordination. The “Coordination Area Across the Region” section seems to imply that regional coordination is required. At the same time, regional coordination does not appear explicitly within the Mandatory Activities or Scoring Criteria.

RCC’s primary purpose is to build community capacity to achieve climate mitigation and resiliency funding. SB 1072 (Leyva, 2018), the legislation that established the RCC program, identifies the following as the purpose for the collaboratives:

“A collaborative shall provide capacity building services to assist in building the community-driven leadership, knowledge, skills, experience, and resources to identify and access public funding for climate change mitigation and adaptation projects within the under-resourced community. Where feasible, a collaborative shall leverage, complement, and build on existing regional efforts and resources for capacity building and technical assistance.”⁴ (emphasis added)

³ California Energy Commission. (2016). SB 350 Low-Income Barriers Study, Part A - Commission Final Report. <https://apastyle.apa.org/style-grammar-guidelines/references/examples/report-government-agency-references>

⁴ Regional climate collaboratives program: technical assistance, Cal. Public Resources Code § 71131(2018). https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180SB1072

As identified in statute, the RCC program’s principal focus is to support under-resourced communities in building capacity and accessing public funding. As a secondary purpose, and only where feasible, SB 1072 directs collaboratives to leverage and complement regional initiatives.

Building local community capacity—building relationships, identifying shared visions, developing projects and plans, providing technical assistance, evaluating project implementation and engaging in peer-to-peer learning—is, by itself, a significant task that requires concentrated focus and strategy. We are concerned that requiring “applicants to focus capacity building activities at multiple scales”⁵ could lead to a diluted focus away from directly building community-driven leadership, knowledge and skills.

Moreover, we are concerned that a focus on regional coordination could lead to inequitable processes and outcomes. Regional planning processes are historically not accessible to impacted community members, community-based organizations, California Native American Tribes and other organizations that serve marginalized communities. We believe that broadening the scope of the collaboratives will make it more challenging to achieve the four RCC Program Objectives: develop actionable plans and projects, build enduring and trusting relationships, center community decision-making and develop equitable processes.

4. Require & Fund External Learning Evaluation to Calibrate Equitable Processes

The Collaborative Stakeholder Structure (CSS), building off the experiences of the Transformative Climate Communities (TCC) program, offers the strongest program design we have seen on collaborative governance. Even with robust design structure, however, we know that operationalizing collaborative governance in under-resourced communities and across power imbalances is more complicated in the real world than on paper. In our experience, TCC communities have faced the most complex challenges on operationalizing collaborative governance, particularly with local government partners.⁶

To balance power dynamics and calibrate the functioning of the CSS, we recommend that SGC fund and require external developmental learning and evaluation of the collaborative partnerships. In particular, we recommend that the RCC program center its learnings around the four Program Objectives: 1) Develop Actionable Plans and Projects, 2) Build Social

⁵Strategic Growth Council. (2022). Draft Round 1 Regional Climate Collaborative Program Guidelines. https://sgc.ca.gov/programs/cace/docs/20220207-RCC_Program_Draft_Guidelines_Round_1.pdf. 11.

⁶ Wang, E., Lu, R. (2021). Fighting Redlining and Climate Change with Transformative Climate Communities. The Greenlining Institute. <https://greenlining.org/wp-content/uploads/2021/10/Fighting-Climate-Change-and-Redlining-with-Transformative-Climate-Communities-Final-Report.pdf>. 94-102.

Infrastructure, 3) Center Community Engagement & Decision-Making, and 4) Develop Equity-Centered Processes.

These Program Objectives sit at the heart of the RCC and its focus on building capacity, partnerships, decision-making and investments for under-resourced communities. Moreover, the majority of the Program Objectives result not in easily quantifiable outcomes, but in improved processes, relationships, trust and community capacity. Ongoing learning and evaluation on the Program Objectives would help to calibrate these complex processes in real time.

GLI's own experiences with learning evaluations informs much of our thinking. Together with Forth Mobility, we co-manage the Towards Equitable Electric Mobility (TEEM) Community of Practice, a peer-to-peer community of advocates building capacity and developing a mutual commitment towards advancing equitable electric mobility strategies. The cohort includes 30 organizations from Colorado, Illinois, Michigan, North Carolina, and Virginia.⁷ A key goal for TEEM is to support environmental justice (EJ) and environmental organizations to work collaboratively to generate shared mobility strategies. Given the traditional divisions between EJ and environmental groups, we know that this requires centering equity voices, cultivating trust-based relationships and building capacity.

To help us calibrate these relationships and processes, we engage with a learning partner, Innovation Network, to learn and evaluate what it takes to build an equitable community of practice.⁸ Their practices consist of the following components:

- **Evaluation of Complex Systems:** Innovation Network focuses on evaluation that measures hard-to-measure concepts such as trust, equity, and shared power through both qualitative and quantitative data. They facilitated the development of “learning questions,” intended to be forward-looking and to guide our learning together.⁹
- **Participatory Planning:** Innovation Network designs their projects through participatory planning, involving stakeholders in all aspects of the evaluation lifecycle (evaluation planning, data collection, analysis and reflection, and reporting). They worked with us to refine our theory of change, identifying what we were trying to achieve, how we planned to achieve it, and how the learning plan supported those goals. This process provided us

⁷ The Greenlining Institute. *Towards Equitable Electric Mobility Community of Practice*. <https://greenlining.org/teem-community-of-practice/>

⁸ Innovation Network. <https://www.innonet.org/>

⁹ For year one of TEEM, we identified three learning questions: 1) What are we learning about implementation and what it takes to successfully design and facilitate a Community of Practice at the state and national level? 2) How can TEEM build Community of Practice members' capacity and shared power to influence equitable clean transportation? 3) What lessons are we learning about TEEM's approach that can be applied to other and future efforts? Innovation Network. *TEEM Learning Agenda*. https://drive.google.com/file/d/1hyJ_l-zmpmBlcUzqt2rbH3PeM2EUmEUC/view

the opportunity at the outset to reflect critically on our goals and intended impact, and then to check in on that progress on a regular basis.

- **Qualitative and Quantitative Data Collection:** Innovation Network collects both qualitative and quantitative data to capture a variety of perspectives and help us answer the learning questions. In the first year, data was collected in real time through monthly reflection meetings with the facilitation team, and a reflection meeting and survey with the TEEM cohort.
- **Learning Tied to Strategy Development and Implementation:** Importantly, this work is framed as a “learning partnership” and not merely as an evaluation. Learnings are directly connected to ongoing strategy development and support us to adjust in implementation. The facilitation team meets with Innovation Network through monthly and quarterly check-ins, plus an annual review, to reflect on learnings and course correct where needed. The check-ins and qualitative data provide us with rich and nuanced insights to groundtruth whether we are meeting our assumptions and theory of change on capacity building.

This development learning and evaluation provides us with regular opportunities to reflect and course correct on our progress and strategies. We offer below two examples where emergent learnings led to shifts in decision-making:

- In our Virginia cohort, environmental organizations gravitated to working on existing policies like the Transportation & Climate Initiative, a regional initiative to reduce transportation emissions through a market-based mechanism. Through our monthly calls with Innovation Network, however, we paused and reflected that we needed to instead ground our shared strategy in the leadership of our EJ organizations. We then took additional time to align our strategy around workforce development and minority-owned business advocacy within the transportation electrification sector. While this revised approach has required us to be more patient in the strategy development process, it was critical in following the leadership of the EJ organizations and leveraging their expertise and priorities.
- Across the national cohort, survey responses revealed that some members were not clear on TEEM’s core goals and objectives. We then placed more emphasis on explaining TEEM’s purpose and checked-in with the cohort to make sure that participants had a clear understanding of how their individual work fit into TEEM’s vision. This increased the efficacy of the project, as participation levels increased and cohort members proactively sought opportunities to advance TEEM’s goals.

Our experience with Innovation Network has transformed the way we think about evaluation. Their mission-driven approach, focus on social justice and qualitative learnings have been invaluable to us in tracking progress on our key goals for year one: building a healthy environment, and developing capacity and shared power. Moreover, having external evaluators

steward the learning and evaluation process, hold us accountable to our stated equity and co-governance goals, and offer a container for reflection and action has been extremely helpful. We offer additional details on Innovation Network’s strategy in the Appendix.

5. Tie Evaluation Learnings to Yearly Grant Contracts

In addition to requiring external learning and evaluation, we also recommend that the evaluation on RCC’s four Program Objectives be tied to accountability measures. If the learning partnerships shows that a collaborative is not showing significant progress towards advancing the Program Objectives, then SGC should reserve the option to not renew the contract for the following year.

Tying evaluation to accountability measures will meaningfully incentivize the collaboratives to implement the equity strategies they outlined in their application. In our experience, we have seen collaborative processes falter in implementation in part because they were measured primarily on tangible outcomes and capital investments, rather than the functioning of these processes. The RCC program, however, focuses on building capacity for under-resourced communities, and does not include any funding for capital implementation. We believe that this unique focus provides SGC the opportunity to make yearly funding contingent on meeting performance standards.

Significant non-performance on the Program Objectives (developing actionable plans and projects, building social infrastructure, centering community engagement and decision-making, and developing equity-centered processes) sends a clear signal that a collaborative is not meeting the RCC’s program core goals. Collaboratives that do not show significant progress on multiple Program Objectives are failing to build community capacity and should therefore not receive funding for the following year.

6. Scoring Criteria Priorities: Project Need, Program Objectives & Strategies, and the Collaborative Stakeholder Structure

We appreciate SGC’s careful consideration of the different elements required in the scoring criteria. We recommend that the following elements receive priority weighting:

Project Need

GLI co-sponsored SB 1072 to respond to the needs of under-resourced communities. We know that there are many communities across California that lack the requisite resources and capacity to compete for State climate funding. Under-resourced communities urgently want to

take advantage of available funds and policies to advance climate equity, but the lack of resources and technical experience make genuine partnership difficult.

Communities that have not been successful in achieving public funding for climate mitigation and adaptation, and who can articulate their community's climate, environmental, socioeconomic and community-wide needs, should be prioritized for the RCC program. Such a demonstration of project need should be directly tied to an overall vision grounded by community-identified solutions.

Program Objectives & Strategies

We are supportive of the overall RCC Program Objectives, and the strategies used to achieve those objectives will determine whether RCC achieves its vision for racial equity. Applicants should be rigorously assessed on their strategies to achieve the four program objectives: develop actionable plans and projects, build social infrastructure, center community engagement & decision making, and develop equity-centered processes.

Collaborative Stakeholder Structure

The RCC program rests on the strength of its collaborative partnerships. Therefore, appropriately weighing the CSS' is key, especially among the following dimensions: that the CSS be composed of a diverse representation of residents and key community-based stakeholders (such as community-based organizations, non-profit organizations and California Native American Tribes), that the applicant team demonstrates existing relationships and trust, and that the Partnership Agreement demonstrates effective and equitable governance structures. In addition, the capacity of the managing stakeholder to manage the overall grant efficiently and equitably is equally important.

CONCLUSION

We thank staff and leadership for their hard work on developing the robust program guidance for the RCC program. We look forward to continuing to work with SGC to operationalize community capacity building at both the place-based and structural scales.

Sincerely,

Emi Wang, Associate Director of Capacity Building
The Greenlining Institute

APPENDIX

Learning Partnership with Innovation Network

GLI engages with Innovation Network on a learning partnership, costing \$160,000 for a one-year contract. We offer the following summaries and documents to support SGC in thinking through evaluation and learning of the Program Objectives.

Scope of Work¹⁰

The scope of work for the project included:

Phase 1: Information Gathering & Evaluation Planning

- Review documents and conduct interviews with the facilitation team to better understand key strategies, underlying assumptions and desired outcomes
- Create a learning agenda that includes broad questions to guide data collection, analysis and reporting to support ongoing learning and strategy development
 - Learning questions frame the evaluation and act as the evaluation “north star.” Learning questions help to connect the evaluation to strategy and decision-making. Questions are focused on exploring trust, relationship-building, curriculum effectiveness, commitment to equity, capacity building and political power. Learning questions belong to the learners, and they are not for the evaluators to answer.
 - Evaluation questions are the specific questions the evaluation is designed to answer. Evaluation questions are nested under each learning question and answering them gives us data and insights for the learning questions.

Phase 2: Data Collection

- Collect data to inform the learning questions. Data sources include:
 - Survey disseminated to all TEEM members to gather a broad range of perspectives and to allow data to be shared independently and anonymously
 - Monthly reflection meetings with the facilitation team to reflect on key achievements and surface emerging insights
 - Reflection meetings with the cohort to reflect on the environment of TEEM, generate insights, and establish new ideas for moving forward. Meetings were held separately with environmental justice (EJ) and environmental groups to allow participants to speak freely and identify similarities and differences across groups.

¹⁰ Innovation Network. *TEEM Learning Partnership - Scope of Work*.
<https://drive.google.com/file/d/1uEtpjkBLbMDK8YyXgShM3ZqSP9754Mb-/view>

Phase 3: Reflection & Learning

- Capture insights, reflections and next steps through multiple check-ins:
 - *Ongoing learning log* which captures learnings emerging from the monthly calls with the facilitation team
 - *“Sensemaking” sessions* with the facilitation team to review data and insights, focusing on shorter-term reflection and learning
 - *Long-term reflection session* with the facilitation team at the end of the year, to translate earlier lessons and apply them to program planning for the following year. Here, participants reflect on the data, generate insights, brainstorm hypotheses for the coming year, and identify opportunities to test those ideas.

Learning Agenda¹¹

The learning agenda drives our collective learning work together. For year 1, a snapshot of our learning agenda, including learning and evaluation questions, looked like the following:

LEARNING QUESTION #1: What are we learning about implementation and what it takes to successfully design and facilitate communities of practice at the state and national level?	
EVALUATION QUESTIONS	DECISIONS THIS LEARNING WILL IMPACT
<p>What is the facilitation group doing to design, implement, and facilitate COPs at the state and national level?</p> <p>To what extent has the facilitation group created a “healthy environment” for the COP?</p> <ul style="list-style-type: none"> ● To what extent have cohort members developed trust? ● To what extent do COP members have a common purpose? ● How has the frequency and level of interventions by the facilitation group supported or hindered COP members’ engagement with TEEM? ● To what extent has TEEM contributed to shared power between EJ organizations who represent communities of color and mainstream organizations? ● How engaged are members in the COP? <p>What aspects of the facilitation group design, facilitation, and implementation have been most</p>	<ul style="list-style-type: none"> ● What topics to focus on in TEEM, when, and for which groups ● Level of involvement with cohort members: balance of hands on/off ● Adapting facilitation style, especially to get EJ groups to lead conversation ● What to continue or what works to include in proposals ● Making adjustments as needed through short-feedback loops

¹¹ Innovation Network. *TEEM Learning Agenda*. https://drive.google.com/file/d/1hyJ_l-zmpmBlcUzgt2rbH3PeM2EUmEUC/view

<p>effective? What was less effective? Why?</p> <p>What was the recruitment/selection process for COP members? What were the successes and challenges?</p>	
<p>LEARNING QUESTION #2: How can TEEM build COP members' capacity and shared power to influence equitable clean transportation?</p>	
<p>What capacities do COP members need to influence equitable clean transportation?</p> <p>What is TEEM doing to build COP members' capacity to influence equitable clean transportation?</p> <p>What TEEM strategies have been most effective in building the capacity of COP members?</p> <ul style="list-style-type: none"> ● What are the barriers to building COP members' capacity? ● What are the capacity gaps? <p>What are COP members taking away from the COP, e.g., relationships, capacity, ability to influence change</p>	<ul style="list-style-type: none"> ● What capacities to build, considering the different needs of cohort members ● What resources to bring to TEEM ● Adapting facilitation style, especially to get EJ groups to lead conversation ● What to advertise and include in recruitment materials for Y2 ● What to focus Y2 curriculum on
<p>LEARNING QUESTION #3: What lessons are we learning about TEEM's approach that we can apply to other and future efforts?</p>	
<p>How has TEEM adjusted their approach to COPs based on emergent needs?</p> <p>What have been the most and least successful aspects of TEEM in achieving its goals? What could be continued or improved?</p> <p>What impact did TEEM have on different member groups (e.g., EJ orgs, mainstream orgs)?</p>	<ul style="list-style-type: none"> ● How TEEM will grow and adjust ● Inform national agenda for equitable clean mobility

Findings & Summary¹²

At the close of our first year of TEEM, Innovation Network summarized our findings and learnings. Key findings focused on the importance of centering equity in design, by:

- Building a container to limit traditional power structures
- Building relationships across diverse groups
- Building capacity and learning opportunities
- Building consensus around key policy priorities

¹² Innovation Network. *Centering Equity in Electric Mobility: The First Year of TEEM.*
<https://drive.google.com/file/d/1Gb4EU1Lg7W8iMDGrLm1i-F2mfSEnDQSA/view>

Innovation Network also identified several lessons learned:

1. Environmental organizations are generally more established on electric transportation, which shifted power to them at times
2. Level-setting was an important stage that allowed members to engage together more meaningfully
3. Power differentials made it more challenging to establish a common purpose
4. TEEM relied on the strong capacity of its facilitators
5. TEEM continues to seek the right balance among relationship building, capacity building, and state action