Community Economic Resilience Fund Planning Phase Draft Guidelines: Round 1 Public Comment Summary

Overview: The Planning Phase Draft Guidelines were released for public comment on December 17, 2021 and were open until January 28, 2022. CERF staff received 31 letters from over 140 organizations and public agencies. Common themes include: inclusive processes and engagement, subregional dynamics and considerations, data and analysis, planning phase requirements and metrics, application considerations, state guidance and resources, and other general comments.

The summary below is not meant to be an exhaustive account of all comments, but rather a collection of the high-level themes taken into consideration as CERF staff continue to refine the planning phase guidelines.

Inclusive Processes and Engagement

- Application process
 - o Require robust community engagement activities and plan as part of application
 - Enable participation from groups with experience in community-based participatory research
 - o Guidance on what to do if there are multiple applications from one region
- Table building and governance
 - o Define what an inclusive process means and what it can look like
 - Make clear that funds go toward community engagement
 - Clarify who should be at the table/leadership structure (e.g., disadvantaged communities, youth, BIPOC, immigrant communities, federal government, local government, business, labor, tribes, educational entities, economic development partners, etc.)
 - Need to track and evaluate participation and representation, particularly from underresourced communities
- Administration
 - Guidelines should clarify administrative responsibilities and fees (e.g., grant writing, direct and indirect)

Subregional Dynamics and Considerations

- To promote collaboration, the State could provide guidance on how existing sub-regional planning efforts will tie into the CERF planning process
- CERF could offer flexibility for sub-conveners to administer separate subregional planning efforts due to reasons including: disregarding needs of disadvantaged communities, being left out of ongoing processes, or lack of existing economic relationships with other subregions within larger regions
- The State could facilitate and require cross-regional sharing of best practices and lessons learned
- Ensure planning resources benefit entire region equitably

Data and Analysis

Require research and analysis on factors such as: race equity; gender identity; educational outcomes
for youth, particularly in marginalized communities; immigrants (differences in impact to noncitizens, refugees, naturalized citizens, undocumented, etc.); barriers for individuals impacted by the
justice system; using CalEnviroScreen to focus investment in communities disproportionately
affected by pollution; and undocumented and migrant workforce analysis

- State should support standardized data collection for all regions
- Allow analysis for necessary or required environmental compliance associated with projects in regional plan

Planning Phase Requirements and Metrics

- Require plans/recommendations that assess regional climate and equity analyses, and target populations disproportionately impacted by the pandemic
- Require metrics that track youth outcomes
- Require community support on proposals as part of the application package
- Criteria for proposed projects should be more detailed, especially in showing how projects will help meet other programs already implemented (e.g., raising labor standards, meeting GHG reduction goals, supporting climate smart and regenerative management of natural and working lands, etc.)

Application Considerations

- Scoring criteria and rubric should be released for public comment
- In scoring process, ensure means to identify stakeholder approval of the proposal

State Guidance and Resources

- Web/tools: the State and each collaborative should establish and maintain a CERF website to serve as a hub/connector for the program;
 - e.g., a State-provided Starter Kit of engagement resources, including a basic demographic profile for regions
- Clarify roles and responsibilities of participating entities e.g., local governments, economic development agencies and MPOs; and provide more detail on fiscal agent responsibilities
- Terms: clarify and provide guidance on "team of teams" concept; what qualifies as an "existing plan"?

General: Planning and Implementation Phases

- Planning:
 - o More time needed for planning phase
 - More clarity on eligible activities
 - o Ability to provide resources to existing organizations to implement planning activities
- Implementation
 - Carry out application process in tranches
 - o Lack of clarity on how the CERF planning phase will feed into the implementation phase
 - Provide more expansive list of example projects
 - Criteria should look at project impact on underserved communities
 - Cap admin costs for implementation projects