

Item 8a

Exhibit B: Public Comment on the Draft Proposition 1 Grant Program Guidelines

Attached are comments received via email, letter, and through webinar registration. For verbal webinar comments, please access the webinar recording video (comments start at 16:00) on our Prop 1 webpage: <https://www.opc.ca.gov/prop1/>.

From: [Jaymee Go](#)
To: [OPC Prop 1 Grant Program](#)
Subject: Parks Now Comments on Prop 1 Revised Guidelines
Date: Tuesday, January 26, 2021 5:20:18 PM
Attachments: [Parks Now-Comments on OPC Prop 1 Guidelines \(1-26-21\).pdf](#)

Hello,

Thank you for the invitation to submit comments on OPC's Revised Prop 1 Grant Guidelines. Below, please find a group comment letter from the Parks Now Coalition. Feel free to reach out if you have any questions.

Thank you,
Jaymee Go
VP of Legislative Affairs
PRIORITY STRATEGIES

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January 26, 2021

Mark Gold
Executive Director,
California Ocean Protection Council
1416 Ninth Street, Suite 1311
Sacramento, CA 95814



RE: Parks Now Comments on OPC Proposition 1 Grant Program Guidelines

Dear Mr. Gold:

As members of the Parks Now Coalition, we thank you for the opportunity to submit comments and recommendations to the Ocean Protection Council (OPC) regarding the Proposition 1 Grant Program Draft Revised Guidelines released on December 23, 2020.

The Parks Now Coalition includes California-based individuals and organizations committed to public health and social and environmental justice. We believe access to parks, the coast, and the state's public lands is fundamental to healthy, vibrant communities. We also acknowledge that underserved communities lack access to the coast and must be supported to attain it.

While the Proposition 1 Grant Program at OPC only relates indirectly the topics we typically prioritize, we nonetheless would like to express our appreciation for the call-out to access in the revised guidelines. We believe that promoting access as an eligible component of a broader project is a strategic approach that will help bridge the gap between public access and responding to other environmental priorities. We applaud OPC's creativity in stretching the Proposition 1 resources to fund these kinds of activities.

To further maximize the accessibility of this program and the benefits it can provide to disadvantaged communities, we would like to offer the following recommendations:

- 1) Provide technical assistance during implementation (or clarify that it is available).
- 2) Allow for planning grants.
- 3) Promote community-based planning and engagement.

Technical Assistance

As many communities have not experienced the benefits of statewide or local grant funding programs for natural resources, the learning curve for nonprofits and local agencies serving as primary grant applicants can be daunting. Therefore, to truly benefit communities entitled to environmental justice, it is important for OPC to support capacity building among grant applicants in those communities through targeted technical assistance.

To do this, we recommend providing comprehensive technical assistance during the grant application process to ensure compliance with all requirements. The draft guidelines should provide additional technical assistance information for the application process.

Additionally, we suggest including a "Guide to Applicant Best Practices," and/or FAQs to help organizations working in underserved communities understand how and when to identify project partners, such as municipalities, that may not otherwise be engaged in the application process.

Planning Grants

Most nonprofits do not operate with large cash reserves or have easy access to financing mechanisms required to defray planning and other predevelopment costs associated grant proposals. In addition, it may prove difficult to find an appropriate partner with significant resources on-hand, like a municipality or public agency, to take the primary applicant role in a proposed project. We fear that these realities may ultimately exclude many ideas for worthwhile projects that would benefit disadvantaged communities. We recommend supporting planning grants, particularly for disadvantaged or severely disadvantaged communities where the inability of local nonprofit organizations or local governments to absorb costs associated with proposal development (for a grant that might not be approved) might lead them to forego proposing altogether.

Community-Based Planning and Engagement

Meaningful engagement that involves community members in all aspects of the project design process is crucial in serving community needs effectively. We appreciate that the revised guidelines already speak to this kind community-based planning and engagement and recommend strengthening the emphasis on that engagement by explicitly including a component focused on community engagement in the scoring criteria for proposals, so it is clear what the weight of that engagement will be in proposal evaluation.

Conclusion

We thank you again for the opportunity to submit these comments and recommendations. We welcome discussion of any of these points. For further communication regarding this letter, please contact Jaymee Go (jaymee@priorityca.com).

Once again, we appreciate all your effort in developing the Revised Guidelines, and we look forward to the success of the program.

Sincerely,

 <p>Marcos Trinidad Director Audubon Center at Debs Park</p>	 <p>Ben McCue Executive Director Outdoor Outreach</p>	 <p>Mira Manickam-Shirley Executive Director Brown Girl Surf</p>
 <p>Sammy Nunez Executive Director Fathers & Families of San Joaquin</p>	 <p>David Diaz Executive Director Active San Gabriel Valley</p>	 <p>Tori Kjer Executive Director Los Angeles Neighborhood Land Trust</p>
 <p>Rico Mastrodonato Government Affairs Director Trust for Public Land</p>	 <p>Belinda Faustinos Executive Director Nature for All</p>	

From: [Kendall Webster](#)
To: [OPC Prop 1 Grant Program](#)
Subject: Revised Ocean Protection Council (OPC) Grant Guidelines - comment letter
Date: Thursday, January 21, 2021 5:47:32 PM
Attachments: [SLT comment letter OPC Prop 1 guidelines.docx](#)

Hello OPC –

Please find my comments attached. Thank you for your consideration.

Kendall

Sonoma Land Trust staff are working remotely. You are welcome to contact me on my cell (707) 595-7887.



Kendall Webster | *Land Acquisition Program Manager (Sonoma Baylands)*

Sonoma Land Trust

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Preferred Pronouns | She/Her/Hers



January 21, 2021

California Ocean Protection Council
California Natural Resources Agency
1416 Ninth street, suite 1311
Sacramento, CA 95814
OPC_Prop1grants@resources.ca.gov

Dear OPC staff,

Thank you for the opportunity to comment on the draft **Revised Ocean Protection Council (OPC) Grant Guidelines**. Sonoma Land Trust (SLT) has a few comments and suggestions:

Acquisition projects are not explicitly included in the definition of eligible projects. **SLT recommends that the OPC guidelines be modified to explicitly include acquisition projects in the definition of eligible projects.** Acquisition is often a crucial first step in the process of protecting an area for restoration and enhancement that will remedy habitat loss and environmental degradation and/or strengthen adaptation to sea level rise.

We understand that OPC's Prop. 1 priority is to fund projects that will benefit communities entitled to environmental justice remedies and/or improve water quality. The draft guidelines require projects to be located within or adjacent to the disadvantaged community (within a 1/2 mile of the community's border) and be within three miles of the coast. SLT believes that this definition is unnecessarily tight and will exclude valuable projects that benefit disadvantaged communities. **SLT recommends that the definition of "serving disadvantaged communities" be expanded to include projects greater than a half mile from the community's border that demonstrate service to disadvantage communities.** For example, SLT has a Sonoma Baylands project that will acquire and restore historic wetlands and allow SLT to expand its Bay Camp program, which serves low-income children from Vallejo and the Boyes Hot Springs area and provides the opportunity to experience shoreline recreation and bilingual environmental education. While the project would serve nearby disadvantaged communities, they are more than a half mile away.

We recommend including the San Francisco Baylands in the definition of "the coast". We are hoping that San Francisco Bay shoreline projects will be eligible.

Thank you for taking these comments into account.

Sincerely,

Kendall Webster
Land Acquisition Program Manager (Sonoma Baylands)

From: [Wyer, Holly@CNRA](mailto:Wyer.Holly@CNRA)
To: [Sloane, Evyan@SCC](mailto:Sloane.Evyan@SCC)
Cc: [Rodriguez, Maria@CNRA](mailto:Rodriguez.Maria@CNRA)
Subject: RE: project eligibility for Prop 1
Date: Friday, January 22, 2021 2:10:24 PM

Hi Evyan,

Thank you for reaching out to us. Planning projects are eligible for Prop 1 funding, but historically implementation projects have competed better in the competitive process. The major change to OPC's priorities for the upcoming round of Prop 1 funding is a focus exclusively on projects benefiting communities entitled to environmental justice. If you're available and interested, we are holding a webinar on Monday to discuss the guideline revisions; to register for the webinar and receive the webinar link, please fill out the registration form [here](#). I hope this is helpful and feel free to reach out with further questions.

Sincerely,

Holly Wyer



**OCEAN
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Holly Wyer · Marine Pollution Program Manager
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From: Sloane, Evyan@SCC <Evyan.Sloane@scc.ca.gov>
Sent: Thursday, January 21, 2021 2:47 PM
To: OPC Prop 1 Grant Program <OPC_Prop1grants@resources.ca.gov>
Subject: project eligibility for Prop 1

Hello,

I'm working on a managed retreat and habitat restoration project in Carlsbad, California called the South Carlsbad Blvd Climate Adaptation Project. I'm curious if the new round of OPC Prop 1 funds could go towards a planning project? We would be applying for the final design and permitting phase. The Coastal Conservancy is currently funding the preliminary restoration design and stakeholder engagement phase of the project.

Thank you!

Evyan Borgnis Sloane

Project Manager, South Coast
California State Coastal Conservancy
Manager, Southern California Wetland Recovery Project
510-286-4162

From: [OPC Prop 1 Grant Program](#)
To: [Cuomo, Juliana](#)
Cc: [Rodriguez, Maria@CNRA](#)
Subject: RE: Prop 1 Round 4 Question
Date: Tuesday, January 26, 2021 12:10:48 PM

Hi Juliana,

Thank you for reaching out to us. For projects that include both a planning and construction component, the work program for the grant would include the permits for construction as part of the deliverables before construction or on-the-ground work could begin. Essentially, you won't need to have all permits complete before the funds are approved if planning is included in the grant. We have funded projects that include both planning and implementation with Prop 1 in the past. The (tentative) deadline for project completion for round 4 will be December 31, 2024. This is based on our fund reversion date for Prop 1, and may be subject to change. We will provide the maximum project length as part of the Letter of Intent Solicitation. I hope this is helpful. Thank you for your interest in our Prop 1 program.

Sincerely,

Holly Wyer



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From: Cuomo, Juliana <Juliana.Cuomo@kimley-horn.com>
Sent: Tuesday, January 26, 2021 7:04 AM
To: OPC Prop 1 Grant Program <OPC_Prop1grants@resources.ca.gov>
Subject: Prop 1 Round 4 Question

Good Morning,

I just wanted to follow-up on a question that was asked during the workshop yesterday in regards to the funding for development and construction projects. So if the grantee came up with a concept and is requesting funds to bring the project through 100 percent design plans AND is requesting funds for construction (ie actual material costs and paying a contractor) all permits need to be in place before those funds are issued? How can all permits be established before issuing final design plans? I understand CEQA can be completed, but more concerned with things regarding the construction general permit. Can proof that the grantee is in progress towards the permit issuance be enough?

Also when is the deadline for project completion after the funds are issued?

Thanks,

Juliana Cuomo, PE (VA)

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Public Comments on Draft Prop 1 Guidelines received through webinar registration and during webinar.

Commenter	Comment
Cory Pukini/ Wildcoast	If our proposed project includes community engagement, and COVID restrictions persist, can we satisfy community engagement requirements through a digital platform? ie Zoom, webinars, etc?
Glen Spain/ Institute for Fisheries Resources	Are OPC grant fund useable for salaries and other personnel support for projects?
Juliana Cuomo/ Kimley Horn	Does the project need to be within 3 miles of the coastline? Or just the community itself?
Juliana Cuomo/ Kimley Horn	Would a community near a bay be considered coastline?
Kim Garvey/ Moffatt & Nichol	Can the grant application include funding for design/ engineering/ permitting, as well as construction?
Kim Garvey/ Moffatt & Nichol	Following up on your answer that CEQA and permitting would need to be completed before Board approval of grant award. Federal and State regulatory permitting is typically not complete until final design is done which would mean design cannot be covered by grant funding. Is that correct?
Marisa Parish Hanson/ CA State Parks	Do the CEQA determination and permits need to be completed by the April letter of intent deadline, or another later date in the solicitation/application process?
Natalie Teeter/ Port San Luis Harbor District	Does a project need to be located within or adjacent to a disadvantaged community to be eligible?
Natalie Teeter/ Port San Luis Harbor District	If a project serves multiple disadvantaged communities, but is not located within or adjacent to them, would it still be eligible for Round 4 funding (and how can this be demonstrated)?
Sharon Sand/ The Trust for Public Land	Do acquisition proposals qualify?
Sudi Shoja/ Engineering Solutions Services, Inc.	25% of overall scoring is allocated for DAC/SDAC. A lot of beach communities do not fall into that and they will be loosing on that 25% altogether. Do you have a recommendation on how, if they have serious problems, how they can benefit from this grant? How can those communities be more competitive?