



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

January 20, 2022

The Honorable Dee Dee Myers  
Senior Advisor and Director  
Governor's Office of Business  
and Economic Development  
1325 J Street, Suite 1800  
Sacramento, CA 95814

The Honorable Samuel Assefa  
Director, Governor's Office  
of Planning and Research  
1400 10<sup>th</sup> Street  
Sacramento, CA 95814

The Honorable Natalie Palugyai  
Secretary, California Labor and  
Workforce Development Agency  
800 Capitol Mall, Suite 5000 (MIC-55)  
Sacramento, CA 95814

Public Comments submitted electronically to [WSBCERF@edd.ca.gov](mailto:WSBCERF@edd.ca.gov)

**RE: Community Economic Resilience Fund Program - Request for Information**

Dear Director Myers, Director Assefa, and Secretary Palugyai:

In response to the Request for Information (RFI) on the Community Economic Resilience (CERF) Program issued December 9, 2021, this letter serves as public comments of the Rural County Representatives of California (RCRC). RCRC is an association of thirty-eight rural California counties and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties. Rural counties across the state represent some of the hardest hit jurisdictions by the COVID-19 crisis as many lacked the basic resources, such as sufficient internet connectivity, to adjust to the quickly changing societal landscape brought about by the pandemic. Additionally, most rural areas already suffered workforce shortages prior to the pandemic, making the challenges of the last two years even more acute in those areas. In short, those struggles in smaller and less resourced jurisdictions have been exacerbated by the effects of

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COVID-19. Therefore, creating an equitable funding program that acknowledges the inherent challenges of regions, and the individual and unique jurisdictions within those regions, is particularly important to our organization.

RCRC submits the following comments for consideration by the Interagency Leadership Team in implementation of the CERF program:

### **Technical Assistance**

In order to ensure equitable access to funding opportunities through Phase I and II of CERF, a technical assistance component should be explicitly outlined as a cornerstone of the program. Unemployment Insurance Code section 14531 (b)(1)(D), as set forth in Senate Bill 162 (Chapter 259, Statutes of 2021) provides that technical assistance is a mandatory component of the program. RCRC suggests that technical assistance be interwoven throughout the program, including, but not limited to:

- Assistance to regions and sub-jurisdictions within those regions through the Interagency Leadership Team or its delegate, to enable smaller and/or less-resourced jurisdictions to participate in the planning phase. Some jurisdictions may not have the staff necessary to apply for grant funding to begin the planning phase and would need the state to assist with application submission or contracting, before the allocation of the \$5 million per region.
- Further, eligible uses for the \$5 million allocation should include technical assistance through locally contracted experts and/or regional public or private partners.

### **Funding Eligibility**

Evaluation criteria for funding eligibility must be clear, concise, and meet regions and sub-jurisdictions where they are in terms of capacity and need. Competitive criteria for funding in both Phase I and II of the program should have maximum flexibility on eligible projects to ensure that all regions have an equal opportunity to address the resiliency needs of their respective communities, while maintaining consistency with the US Department of Treasury requirements pursuant to the Final Rules released this month.

Additionally, as the program focuses on resiliency through the implementation of carbon-neutral technologies, the criteria should acknowledge that technologies may differ depending on geography and other factors outside the jurisdiction's control.

### **Eligible Applicants**

Local governments must be explicitly included as an eligible entity for funding under the CERF program. Local governments have exclusive land use planning authority and therefore hold an integral position in planning and implementing infrastructure projects. In addition, there are numerous statutory requirements on local governments that intersect with infrastructure projects consistent with CERF, such as construction of Electric Vehicle charge stations (Assembly Bill 1236, Chapter 598, Statutes of 2015).

### **Safeguard Collaboration**

Some of the thirteen CERF regions established by the Interagency Leadership Team are quite expansive and diverse, both in demographics and geography. It is imperative that rules of engagement within the regions as well as application requirements safeguard sub-jurisdictions equitable participation in the program. For instance, the Southern Border region includes the counties of San Diego and Imperial – two very differently situated political jurisdictions – with varying needs based on geography, resources, capacity and politics. However, both counties, as well as the cities within those counties, must have equal representation at the regional planning table.

Likewise, the North State Region is geographically expansive, including 10 counties and the cities within those counties. Though many of these counties are alike in capacity and resources, the jurisdictions may lack appropriate resources, such as a trained workforce, making some projects more difficult. Additionally, infrastructure projects in remote areas are historically more expensive to due to geographic and logistical challenges. These factors should be considered when formulating funding amounts and eligibility requirements.

Lastly, we support recommendations made by the California Association for Local Economic Development (CALED) in response to the RFI (as submitted January 18, 2022).

Thank you in advance for consideration of our comments. We look forward to continued engagement in the process of developing the guidelines for the CERF program. Please feel free to contact me directly at [trhine@rcrcnet.org](mailto:trhine@rcrcnet.org) with any questions or comments.

Sincerely,



Senior Policy Advocate  
Rural County Representatives of California