



December 7, 2022

Public Comment: CERF Economic Diversification Pilot Projects Framework

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Valley Vision, the designated Regional Convener and Fiscal Agent for the Sacramento Region — including Colusa, El Dorado, Nevada, Placer, Sacramento, Sutter, Yolo, and Yuba counties — expresses our support of the ongoing Community Economic Resilience Fund (CERF) efforts. We appreciate the Administration seeking input on the **Economic Diversification Pilot Projects Framework**. We submit the comments and questions below for your consideration.

1. The timing of the Pilot Projects Framework creates challenges to building the High Road Collaborative coalition in this nascent stage.

As stated in our public comment for the CERF Planning Phase Draft Guidelines, we are supportive of the Implementation Phase being carried out in tranches, with the first tranche of funding dedicated to early implementation projects, and latter tranches dedicated to projects elevated in the regional Collaboratives. However, we submit that a January Solicitation for Proposals presents a challenge in carrying out the CERF program’s mission of advancing a cohesive, regional vision.

First, Valley Vision, as the Regional Convener and Fiscal Agent, is still in the early stages of operationalizing the CERF program for the Sacramento Region — continuing to build out the Collaborative, standing up the governance structure, and inventorying and identifying gaps in existing research assets for the the Regional Summary Analysis. Additionally, the fact we are not yet under contract as the Regional Convener and Fiscal Agent presents a capacity challenge to mobilizing to ensure those in our region are ready and able to respond effectively and competitively to this opportunity.

Second, the CERF program calls for our region to embark on a two-year process that asks those in our eight counties to think about what a broader, more unified vision of regional economic development might look like. To ask them to compete amongst themselves for CERF implementation funds before the CERF process has meaningfully begun undermines the work



that has been done the last six months to build our initial Collaborative ahead of submission of the CERF program Planning Phase grant application.

If adjusting the timeline around the rollout of this early implementation funding is not feasible, we seek from the state CERF leadership team additional guidance and reconsideration around some of the draft parameters, as detailed in the comments and points of clarification below.

2. We seek guidance from the state leadership team on the role of the Regional Convener in the Pilot Projects Framework.

Regional Conveners are charged with organizing an inclusive group of regional stakeholders to form the Collaborative. This requires facilitating buy-in into a broader, cohesive regional process and vision, including standing up processes that ensure that underinvested communities and underfunded initiatives are elevated. Given that the Pilot Projects Framework is intended to be a separate process from the two-year CERF Planning Phase, we seek guidance from the state on how the Regional Convener can effectively support this process, keeping in mind the ultimate goal of moving towards the the development of a broader, cohesive regional vision and plan. The proposed timing of the Pilot Projects Framework — with a Solicitation for Proposals being released in January 2023, before the Regional Convener and Collaborative have had the opportunity to fully operationalize — makes the role of Regional Convener unclear, apart from disseminating information and supporting all applications coming from the region that speak to CERF goals.

3. We ask that the state provide a clear and specific criteria that demonstrates how it will prioritize equity in selecting applications to be awarded.

The Pilot Projects Framework provides that projects must “prioritize equity, sustainability, job quality and access, and economic competitiveness and resilience” (Page Two). With respect to the equity requirement, we ask that the state provide a clear and specific scoring rubric to operationalize this criteria. This will ensure that projects that are implementation-ready but have traditionally had a more limited visibility or capacity to fundraise are given a pathway for being competitive for these implementation funds.

4. We ask that the state reconsider awarding additional points to applications that have Collaborative endorsement.

The Pilot Projects Framework states that “applications with a letter of support from a CERF HRTC will receive additional points in the scoring process” (Page Three). As noted in Number 1



above, our Sacramento Region is still in the early stages of operationalizing the CERF program. Additionally, we are still undergoing the contracting process with the state, and have yet to receive a final contract containing guidelines for the administration of the grant. January, the expected release of Solicitation for Proposals, is not a realistic timeframe for formally convening our Collaborative and establishing a formal and transparent process for endorsing applications, while still adhering to the CERF goal of equity. Therefore, if the timing of the Pilot Projects Framework cannot be adjusted, we seek that the Pilot Projects Framework be amended to remove this provisioning of awarding additional points to applications with Collaborative endorsement.

5. We seek additional, more explicit definitions of some of the key terms in the Pilot Projects Framework, including:

- a. **High Road** - Although the Pilot Projects Framework makes reference to the high road intention of CERF, the definition of “high road,” as included on page 42 of the Planning Phase Solicitation of Proposals should also be included in full: “A set of economic and workforce development strategies to achieve economic growth, economic equity, shared prosperity and a clean environment. The strategies include, but are not limited to, interventions that: (1) improve job quality and job access, including for women and people from underserved and underrepresented populations; (2) meet the skill and profitability needs of employers; (3) meet the economic, social, and environmental needs of the community.”
- b. **Adopted Local Plan** - What specifically constitutes an adopted local plan? Does this refer to a plan that has been approved by a City Council or County Board of Supervisors via resolution or letter of support? Does it include Comprehensive Economic Development Strategies, or other regional plans, even if not approved by the Economic Development Administration?

Thank you for your leadership and for the opportunity to provide feedback. We look forward to continuing to engage with your team.

Sincerely,

Evan Schmidt
CEO of Valley Vision