

## **Comment 1 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Pamela

Last Name: Evans

Email Address: [pamela.evans@acgov.org](mailto:pamela.evans@acgov.org)

Affiliation: Alameda County Green Business Program

Subject: Funding Support for Local, Multi-Environmental Media Business Assistance Programs

Comment:

Alameda County's Green Business Program is a member of the California Green Business Network. Each of the 24 (and growing) local programs offer a beyond-compliance environmental certification to mostly small-to-medium sized businesses, many of which are located in disadvantaged communities.

Right NOW, California's 24 local Green Business Programs are out working with businesses to implement many greenhouse gas measures that state government wants them to embrace -including waste reduction, organics diversion, energy efficiency in lighting, heating, cooling and refrigeration, water conservation and greener chemistry.

The California Green Business Programs accomplish multiple AB32 goals with small, but highly leveraged local budgets. Working with local waste, energy and water utilities, we hand-carry valuable utility rebates and technical assistance to small businesses that often these businesses are unaware of prior to starting on GB certification. So far we've only been able to serve 3000 businesses all the way through to certification, though we've pointed hundreds more toward these types of valuable resources! We have a vision to serve 10,000 businesses by 2020, but we'll need more funding to do that.

It's challenging for multi-media programs like ours to gain state funding from multiple, single-media focused departments. Our program uses a multi-media approach to improve business environmental performance. So, we want to see the Investment Plan administer Cap and Trade funds to local programs through a single state environmental program with a similar comprehensive view.

We were inspired to start our Green Business Program back in 196 after seeing that multimedia programs like ours work based on our experiences in the early 1990s. With the help of many local partners and a state grant, Alameda County's Hazardous Materials Program succeeded in attracting some of the most-environmentally-impactful business types - automotive repair, printers, metal platers and dental offices - to a series of compliance, resource conservation and pollution prevention workshops. Many participating businesses signed up for onsite technical assistance visits from our local, multi-agency team after the workshops - voluntarily! Many businesses were driven to engage in this relationship by fear of regulation. However, more than half wanted to be strategic and get ahead of the regulations. These businesses were motivated by their own environmental values as well

as concern for their employees and neighbors in the community. From their perspective, our multi-media approach ADDED VALUE to the workshops.

When an Association of Bay Area Governments advisory group recommended establishing a recognition program for businesses that go beyond existing regulations, and conserve resources and use cleaner materials, we were ready to jump! With a similar consortium of local agency & US EPA resources, we launched our Green Business Program, certifying our first businesses in 1997. Other local GBPs launched in the following years.

The Green Business Program is now statewide with 24 local programs operating in over 150 cities. When you put together all the measured environmental outcomes from our 3000, mostly small green businesses, you get some HUGE environmental outcomes, for example:

- over 800,000 metric tons of greenhouse gas emissions reduced by our businesses - this data is based on metrics gathered through the GBPs and calculated using our statewide database, which was developed with support from DTSC.

The Concept Paper for the Draft Second Investment Plan includes several references to small businesses under the heading of "Rural Communities and Small Businesses":

We have some additional insights that might help further refine how AB32 can be successful with small businesses. We have been working with small businesses since the '90s, and collectively, they have a big impact in terms of greenhouse gas reductions, as our metrics demonstrate. The Plan currently describes specific small business greening efforts such as refrigeration retrofit, solar roofs, or electric vehicle purchases. The Green Business Program have observed that, in addition to these measures, MUCH MORE is doable by small businesses.

To use our relationship to push a single initiative, when we could promote several, is a lost opportunity. It is much more cost effective, and frankly, doable in our experience, to incentivize small businesses to meet all of the AB32 goals, including water conservation, energy conservation, waste reduction, green chemistry and alternative transportation. For example, composting green waste and food scraps reduces landfill waste, but also cuts greenhouse gases and provides a valuable soil enrichment resource. Saving energy with better lighting and refrigeration saves on business operating cost, and also cuts greenhouse gases and power plant emissions. Preventing pollution by using greener chemistry preserves the health of employees, but also of nearby communities and ecosystems. This multimedia approach increases the value of engaging with each business, both for the business and for our program.

Un-siloed, multi-faceted programs like ours are challenged in having to seek funding competitively from multiple state agencies, each serving only one media, and one AB32 goal. To the extent that the process allows, we ask that the state use a comprehensive view so that multi-pronged organizations like GBPs in the California Green Business Network can better help to meet California's greenhouse gas emissions goal, enable the full array of social,

environmental and economic co-benefits that are possible, and make AB32 a success.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-11-04 09:13:48

No Duplicates.

## **Comment 2 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Kim

Last Name: Springer

Email Address: kspringer@smcgov.org

Affiliation: County of San Mateo

Subject: Cap and Trade Proceeds

Comment:

As a program manager for multiple resource conservation and climate action programs in coordination with the 20 cities and the county in San Mateo County, I am trying to accomplish, at the County level, what you, the CARB is trying to accomplish at the State level, reduction of GHG emissions and pollution, shared equity, economic development, and sustainable use of our natural resources for our and future generations.

I am not alone. Every year I meet more and more program coordinator-level staff from other cities and counties in the state, basically all working on the same goals.

These programs and their funding needs have changed, just like your (the State's) programs and funding needs have changed. We all now work under a new umbrella, climate change!

Addressing climate change knows few boundaries, and this includes funding sources. Gone are the days of the need to fund just energy-, water-, solid waste-, transportation-, pollution prevention-, equity-, or economic-related issues. Approaching the "players" to implement the much needed changes in how we work and live is more cost- and time-effective if we combine these sources and opportunities into cohesive programs.

That's where Cap and Trade funds come in. This, the grand CARB source of funding, and it's also cohesive or "un-siloed". But, as soon as CARB doles out the fund, to a specialized agency to grant out the funds, they are less so or completely, again, siloed.

I urge the ARB to set aside a large percentage of funds for modern, cost- and time-effective programs, such as the California Green Business Program, which addresses all issues and opportunities in one cohesive, un-siloed program. Support the many small businesses in CA in their participation in the climate solution, the economic well-being of their business and community and the health of their employees.

Set aside funds in the ARB Spending Plan for the CA Green Business Program and other comprehensive programs that provide value to small business in CA, or direct one of the recipient agencies to work with the CA Green Business Program.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-11-04 10:08:25

No Duplicates.

### **Comment 3 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Earle

Last Name: Cummings

Email Address: earlewc@yahoo.com

Affiliation:

Subject: Carbon sequestration in soil/disadvantaged rural greening

Comment:

Last night I attended a program in Healdsburg by a produce grower who has developed a very effective and economical, even profitable system of minimal tillage, mulching, growing transplants and interplanting vegetables to sell at local markets that has increased soil carbon nearly ten-fold in a few years. This could be adapted to food-desert urban areas, disadvantaged rural communities, and applied in areas currently managed by tillage and herbicide application, such as orchards and vineyards.

It would take re-training of urban residents as well as farmers accustomed to perpetual plowing, tilling, herbiciding, and disking to control vegetation. It also improves soil conservation, water conservation, water quality and other unfortunate consequences of traditional highly mechanized agriculture.

A videotape is available from the Russian Riverkeepers.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-11-06 07:09:45

No Duplicates.

**Comment 4 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Steven

Last Name: Brink

Email Address: steveb@calforests.org

Affiliation: California Forestry Association

Subject: Cap-And-Trade draft 2nd Investment Plan

Comment:

Comments attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/4-investplan2-ws-U2Jdb1BgUTNQZ1Bo.docx>

Original File Name: 151108\_cfa\_cap-and-trade second investment plan comments.docx

Date and Time Comment Was Submitted: 2015-11-08 14:34:58

No Duplicates.

**Comment 5 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Steven

Last Name: Brink

Email Address: steveb@calforests.org

Affiliation: California Forestry Association

Subject: Comments on draft 2nd cap-and-trade investment plan

Comment:

2nd set of Comments that are supporting documentation to my first set of comments is attached. I do not have zip file capability.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-investplan2-ws-BjcCMQExVjVWYAg8.docx>

Original File Name: 151004\_Biomass\_Report\_Version\_7.docx

Date and Time Comment Was Submitted: 2015-11-08 14:42:34

No Duplicates.



**Comment 6 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Kevin

Last Name: Kumataka

Email Address: kevin.kumataka@sonoma-county.org

Affiliation: County of Sonoma

Subject: Request for funds to become available to multimedia programs

Comment:

Thank you for this opportunity to provide online comment on the Second Draft of the Investment Plan. My comments are attached.

Best,

Kevin Kumataka

Sonoma County Green Business Coordinator

kevin.kumataka@sonoma-county.org

707-565-6455

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-investplan2-ws-BmlXPwFsUGoCalUw.docx>

Original File Name: Online comments for 2nd Draft of the Investment Plan.docx

Date and Time Comment Was Submitted: 2015-11-09 10:54:04

No Duplicates.

**Comment 7 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Curtis

Last Name: Wright

Email Address: cstockman@kscsacramento.com

Affiliation: California Biodiesel Alliance

Subject: Draft Concept Paper for Cap-and-Trade Auction Proceeds Second Investment Plan  
Comment:

Attached is a comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/8-investplan2-ws-UDNcOFc3Ag4HcgJ3.doc>

Original File Name: CBA Support\_2nd Investment Plan Updated Concept Paper 11.09.15.doc

Date and Time Comment Was Submitted: 2015-11-09 14:51:27

No Duplicates.

**Comment 8 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Dan

Last Name: Silver

Email Address: dsilverla@me.com

Affiliation: Endangered Habitats League

Subject: Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Comment:

Please find attached comments (4 pages) from Endangered Habitats League.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-investplan2-ws-Wj8HaQdqVStXNQV3.pdf>

Original File Name: EHL-DraftSecondInvestmentPlan-Comments.pdf

Date and Time Comment Was Submitted: 2015-11-09 14:57:40

No Duplicates.

## **Comment 9 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Mike

Last Name: Sandler

Email Address: [mike@carbonshare.org](mailto:mike@carbonshare.org)

Affiliation: Carbon Share

Subject: Return auction proceeds to people: Cap & Dividend

Comment:

Regarding the Cap-and-Trade Auction Proceeds Draft Second Investment Plan, I encourage ARB to include directing auction proceeds back to people as a climate dividend into the Final Investment Plan. The California Climate Credit showing up twice a year on electricity bills is a good start. The state could expand that to an off-bill per capita dividend that would be simple, transparent, and be inclusive of disadvantaged communities. Please see the attached comments for more information.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-investplan2-ws-BWZUPQdrAz1VNgRq.pdf>

Original File Name: CommenttoARB11-8-15Sandler.pdf

Date and Time Comment Was Submitted: 2015-11-09 18:33:13

No Duplicates.

**Comment 10 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Veronica

Last Name: Pardo

Email Address: veronica@crrcnorth.org

Affiliation: California Refuse Recycling Council

Subject: Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Comment:

Thank you for the opportunity to comment on the Draft Cap-and-Trade Auction Proceeds Second Investment Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/11-investplan2-ws-WzhdKVQnAjIKbwZn.pdf>

Original File Name: CRRCCapTradeInvestmentPlanFINAL.pdf

Date and Time Comment Was Submitted: 2015-11-10 12:06:54

No Duplicates.

**Comment 11 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Michael

Last Name: Pimentel

Email Address: michael@caltransit.org

Affiliation: California Transit Association

Subject: Comments on Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Comment:

Comments on the draft "Cap-and-Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19" from the California Transit Association's Executive Director Joshua W. Shaw included here as an attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-investplan2-ws-UzICdwByVGgAZVA5.pdf>

Original File Name: Association Letter re Second Investment Plan - 11-10-15.pdf

Date and Time Comment Was Submitted: 2015-11-10 13:34:41

No Duplicates.

## **Comment 12 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Laurie-Ann

Last Name: Barbour

Email Address: carrotlover@igc.org

Affiliation:

Subject: Include dividends in Cap and Trade Auction Proceeds

Comment:

Regarding the Cap-and-Trade Auction Proceeds Draft Second Investment Plan, I encourage ARB to include directing auction proceeds back to people as a climate dividend into the Final Investment Plan. The California Climate Credit showing up twice a year on electricity bills is a good start however many people do not know about it and/or think it comes from their utility (not realizing it is part of Cap and Trade). The state could expand that to an off-bill per capita dividend that would be simple, transparent, and be inclusive of disadvantaged communities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-11-11 09:45:54

No Duplicates.

**Comment 13 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Kate

Last Name: Meis

Email Address: kmeis@lgc.org

Affiliation: Local Government Commission

Subject: Comments on Investment Plan Draft

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/14-investplan2-ws-VDhcPVc1VlpXOABu.pdf>

Original File Name: LGC\_InvestmentPlan\_Letter\_2.pdf

Date and Time Comment Was Submitted: 2015-11-11 16:07:40

No Duplicates.



**Comment 14 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Stacey

Last Name: Meinzen

Email Address: staceymeinzen@gmail.com

Affiliation: Mrs.

Subject: dividends for cap and trade

Comment:

Regarding the Cap-and-Trade Auction Proceeds Draft Second Investment Plan, I encourage ARB to include directing auction proceeds back to people as a climate dividend into the Final Investment Plan. The California Climate Credit showing up twice a year on electricity bills is a good start. The state could expand that to an off-bill per capita dividend that would be simple, transparent, and be inclusive of disadvantaged communities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-11-11 19:38:30

No Duplicates.

**Comment 15 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Marc

Last Name: Landgraf

Email Address: mlandgraf@openspaceauthority.org

Affiliation:

Subject: Santa Clara Valley Open Space Authority Comments - Natural & Working Lands  
Comment:

Hello,

Attached are Santa Clara Valley Open Space Authority's comments on the Cap-and-Trade Auction Proceeds Draft Second Investment Plan. Thank you for the opportunity to provide public comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-investplan2-ws-AHNTNIUiVmpVIFlz.pdf>

Original File Name: SCVOSA - Investment Plan Comments.pdf

Date and Time Comment Was Submitted: 2015-11-12 08:49:50

No Duplicates.

**Comment 16 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Stacey

Last Name: Sullivan

Email Address: ssullivan@suscon.org

Affiliation: Sustainable Conservation

Subject: 2nd Investment Plan comments

Comment:

Please excuse the double submission - incorrect email entered on previous post. Thank you for the opportunity to comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/19-investplan2-ws-UyBWJVUnV3ALbABp.docx>

Original File Name: Sustainable Conservation Investment Plan comments.docx

Date and Time Comment Was Submitted: 2015-11-12 09:24:25

No Duplicates.

**Comment 17 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Jeffrey

Last Name: Schub

Email Address: jeff@coalitionforgreencapital.com

Affiliation: Coalition for Green Capital

Subject: Coalition for Green Capital comments on Section VI.A.2 - Efficient Financing Mechanisms

Comment:

Thank you for providing us with the opportunity to comment. Our comments are attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/20-investplan2-ws-BmVSO1I+WGyLaABu.pdf>

Original File Name: Comment Letter on Draft Cap-and-Trade Auction Proceeds Second Investment Plan - submitted version.pdf

Date and Time Comment Was Submitted: 2015-11-12 09:58:33

No Duplicates.

**Comment 18 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Ian

Last Name: Padilla

Email Address: [ipadilla@m-w-h.com](mailto:ipadilla@m-w-h.com)

Affiliation: Coalition for Adequate School Housing

Subject: Public Comment Letter: Cap-n-Trade 2nd Investment Plan

Comment:

Attached is the Coalition for Adequate School Housing's (CASH) public comment letter on the ARB's Second Cap-n-Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19.

Please let me know if you have successfully received the attached letter document.

Thank you,

Ian Padilla

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/21-investplan2-ws-VzQGYVclWGMHXgVj.docx>

Original File Name: CASH Final ARB Letter 2015.docx

Date and Time Comment Was Submitted: 2015-11-12 10:31:07

No Duplicates.

**Comment 19 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Katherine  
Last Name: Valenzuela Garcia  
Email Address: kgarcia@sacbreathe.org  
Affiliation: Breathe California

Subject: Comments on Draft Second Investment Plan  
Comment:

See attached letter for comments.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-investplan2-ws-UTJSO1wwUmxRMgln.pdf>

Original File Name: Comment Letter\_Draft Second Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-11-12 11:26:39

No Duplicates.

**Comment 20 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Virginia  
Last Name: Klausmeier  
Email Address: vklausmeier@sylvatex.com  
Affiliation: Sylvatex Inc.

Subject: Cap-and-Trade Auction Proceeds, Second Investment Plan  
Comment:

Please see the attached letter.

Thank you,

Virginia Klausmeier

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-investplan2-ws-UT0GYwZhWWISIFQx.pdf>

Original File Name: LCFCTemplateCommentLTRGGRF10Nov2015VKsig.docx (1).pdf

Date and Time Comment Was Submitted: 2015-11-12 12:28:29

No Duplicates.

**Comment 21 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: James  
Last Name: Oyler  
Email Address: jim@genifuel.com  
Affiliation: Genifuel Corporation

Subject: Comment Submittal  
Comment:

Please see attached comment provided on behalf of Genifuel Corporation

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/24-investplan2-ws-W2kGMAY2B2ECNQMy.docx>

Original File Name: 20151113 Genifuel Comment Letter Low-Carbon Fuels.docx

Date and Time Comment Was Submitted: 2015-11-12 13:14:31

No Duplicates.



## **Comment 22 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Paul  
Last Name: Chapman  
Email Address: pchapman5@gmail.com  
Affiliation: Inverness Associates

Subject: RE: Second Draft Cap-and-Trade Auction Proceeds Second Investment Plan  
Comment:

November 12, 2015  
Chair Mary Nichols and Board Members  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

RE: Second Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Dear Ms. Nichols and Board members:

As a member of the Sustainable Schools Coalition I am writing to urge that you consider incorporating a focus on California's 10,000 K-12 schools for the investments in your Investment Plan.

I have reviewed the Draft Investment Concepts and believe there is a strong connection to K-12 schools in the three areas of focus: Transportation & Sustainable Communities, Clean Energy & Energy Efficiency, and Natural Resources & Waste Diversion. As a long-time California K-12 teacher, administrator, and principal, I now work to support schools that promote environmental education and literacy, that take steps to become more energy efficient, and that work to reduce their footprint. It is well established that greener, more environmentally sustainable schools can help us achieve a "triple bottom line": they save money, promote health, and boost achievement. Our schools just need adequate funding, monies that the CARB can help to provide.

Thank you for considering ways to increase funding from the Cap-and-Trade Auction Proceeds Investment Plan to help develop sustainable schools in California.

Sincerely,

Paul Chapman  
Executive Director  
Inverness Associates  
pchapman5@gmail.com  
510-520-6657

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-investplan2-ws-WzxSMwd0WG0HYIU6.docx>

Original File Name: GGRFCommentIA111015.docx

Date and Time Comment Was Submitted: 2015-11-12 13:43:46

No Duplicates.

**Comment 23 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Kristin

Last Name: Berger

Email Address: kristinberger@sonic.net

Affiliation: Center for Climate Protection

Subject: Cap-and-Trade Investment Plan

Comment:

Regarding the Cap-and-Trade Auction Proceeds Draft Second Investment Plan, I encourage ARB to include directing auction proceeds back to people as a climate dividend into the Final Investment Plan. The California Climate Credit showing up twice a year on electricity bills is a good start. The state could expand that to an off-bill per capita dividend that would be simple, transparent, and be inclusive of disadvantaged communities.

Thank you for your consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-11-12 13:53:34

No Duplicates.

**Comment 24 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Lisa

Last Name: Mortenson

Email Address: lisa@communityfuels.com

Affiliation:

Subject: Cap and Trade Auction Proceeds, Second Investment Plan

Comment:

Please see comments attached. GGRF funding is critical to support existing in-state advanced biofuel producers.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-investplan2-ws-UTAAAdAdkBwsKbwRr.pdf>

Original File Name: ARB Comments - Community Fuels - Cap and Trade 2nd Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-11-12 14:02:19

No Duplicates.

**Comment 25 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Seyed

Last Name: Sadredin

Email Address: Seyed.Sadredin@valleyair.org

Affiliation:

Subject: Comments on Cap and Trade Auction Proceeds Second Investment Plan

Comment:

Our comments are attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-investplan2-ws-AGMGb1A8WGZRMgZo.pdf>

Original File Name: Comments on draft cap and trade second investment plan.pdf

Date and Time Comment Was Submitted: 2015-11-12 15:00:37

No Duplicates.

**Comment 26 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Pete

Last Name: Montgomery

Email Address: pete@pmontgomeryconsulting.com

Affiliation: Clean Air Task Force (CATF)

Subject: Clean Air Task Force comments on Second Investment Plan re. Carbon Capture & Sequestration

Comment:

Please find attached comments from the Clean Air Task Force regarding support for a CCS demonstration project, sent on behalf of John Thompson, CATF Director of Fossil Transition.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/29-investplan2-ws-UzBXMFAIBTAEXVIx.docx>

Original File Name: CATF CARB Investment Plan Submission.docx

Date and Time Comment Was Submitted: 2015-11-12 15:08:55

No Duplicates.

## **Comment 27 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Albert

Last Name: Straus

Email Address: albert@strausmilk.com

Affiliation:

Subject: Short Lived Climate Pollutants and Daries- Straus Family Creamery

Comment:

Given that California's dairies are the primary source of methane emissions in the state (CARB Short-lived Climate Pollutant Reduction Strategy Concept Paper), Straus Family Creamery recommends that methane digesters be mandated on all dairies in California with a herd size of more than 100 cows by the year 2020, provided that a viable third-party ownership model for methane digesters is established. Due to the risk and time burdens associated with owning and operating digesters, a third-party ownership model that supports long-term operations of 20 years+ is recommended as an option for dairies. This type of arrangement allows the dairy operator to be responsible only for the supply of waste; and not for paying capital costs, nor for the time and expertise needed to run a digester operation. Dairy operators would thus have the choice of owning and operating a digester themselves, or of having a third-party own and manage the digester, to meet the mandate. We also recommend incentivizing co-digestion in regions with a high number of dairies. Additionally, co-digestion could be expanded to multiple waste streams, to realize dual benefits of reducing methane from dairies and landfills, where the opportunity arises. Lastly, we recommend including incentives that support research and demonstration projects to reduce emissions of bovine enteric methane, which account for an estimated 29% of all methane emissions in the state (CARB 2013 GHG Inventory).

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-11-12 15:38:31

No Duplicates.

**Comment 28 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Karen

Last Name: Gaffney

Email Address: Karen.Gaffney@sonoma-county.org

Affiliation:

Subject: Sonoma Agricultural Preservation & Open Space District Comments - Natural & Working Lands

Comment:

Hello,

Attached is Sonoma Agricultural Preservation and Open Space District's comments for the Cap-and-Trade Auction Proceeds Second Investment Plan. Thank you for the opportunity to provide public comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-investplan2-ws-BXYHblM8UW1VPgRl.pdf>

Original File Name: Sonoma Comments for Cap and Trade Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-11-12 15:45:43

No Duplicates.



**Comment 29 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Diana

Last Name: Vazquez

Email Address: Diana.Vazquez@sierraclub.org

Affiliation: Sierra Club California

Subject: Second Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Comment:

See attachment

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/32-investplan2-ws-VTYCZVQIVVIQN1A+.pdf>

Original File Name: Cap and Trade Auction Proceeds Second Investment Plan Draft (Final).pdf

Date and Time Comment Was Submitted: 2015-11-12 15:41:45

No Duplicates.

**Comment 30 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Cory  
Last Name: Bullis  
Email Address: cory@csgcalifornia.com  
Affiliation:

Subject: California Association of Resource Conservation Districts Comments  
Comment:

Hello,

Attached are California Association of Resource Conservation District's comments for the Cap-and-Trade Auction Proceeds Draft Second Investment Plan. Thank you for the opportunity to provide public comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-investplan2-ws-AGNWMVMgBDRRMwVa.pdf>

Original File Name: CARCD - Investment Plan Comments .pdf

Date and Time Comment Was Submitted: 2015-11-12 16:51:03

No Duplicates.

## **Comment 31 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Erich

Last Name: Pfuehler

Email Address: [epfuehler@ebparks.org](mailto:epfuehler@ebparks.org)

Affiliation: East Bay Regional Park District Gov Aff

Subject: East Bay Regional Park District Comments

Comment:

November 12, 2015

The Honorable Mary D. Nichols  
Chair, California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

RE: Cap-and-Trade Auction Proceeds Second Investment Plan

Dear Chair Nichols:

Thank you for your leadership and service to the State of California. Your vigilant work in advocating for our environment and public health has helped California play an international role in efforts to address climate change. On behalf of the seven elected members of the East Bay Regional Park District's Board, we wish to officially comment on the Cap-and-Trade Auction Proceeds Second Investment Plan.

The Park District is a steward of nearly 120,000 acres in the eastern San Francisco Bay Area - one of the most urbanized regions of California - and operates 200 plus miles of paved active transportation trails. The District is well positioned to support the State's efforts to achieve greenhouse gas reduction objectives.

We applaud the recent October 27th Draft Second Investment Plan. We are pleased to see so many placeholders or "buckets" that our work as a public natural resource management agency could support. Importantly, we appreciate that special districts, such as our Public Resources Code 5500 agency, are identified as potential recipients for cap-and-trade proceeds. The grasslands, forests rangelands, wetlands, shorelines and open spaces we manage surely have an important role to play in protecting and growing carbon stocks on natural and working lands.

Forest Carbon Plan:

We believe the Forest Carbon Plan designated in the October 27th Draft Investment Plan is an extremely important step. The Park District's Fire Department works squarely in the middle of the wildland-urban interface in the East Bay Hills. From 1923 to 1991, there were 15 major wildfires in the East Bay Hills interface. The 1991 East Bay Hills fire was nearly 25 years ago, but it is still the most costly of any wildfire in California. District employees were first responders when 25 people died and

3,280 residences were destroyed resulting in \$1.5 billion in damages. Since that horrific event, the Park District has implemented a Wildfire Hazard Reduction and Resource Management Plan. This is ongoing, costly work. The Forest Carbon Plan should not only look at largescale forest carbon storage in rural areas, but the important work of protecting against wholesale releases of carbon where the wildland-urban interface places not only trees, but homes, infrastructure, vehicles - and most importantly, people - at risk. Historically, catastrophic carbon release due to wildfire has occurred in the East Bay Hills nearly every four and a half years. We are long overdue for another, but with proper costly management, and despite extreme drought conditions, it is being prevented. Proper funding for fuels management work in these interface areas should be prioritized. Implementation strategy: Develop grant guidelines within the Forest Carbon Plan that consider or add points for wildland-urban interface fuels management work.

#### Leveraging Investments:

We appreciate the sentiment that "state-federal and public-private partnerships" will be "critical to effective management of natural and working lands in California." We agree that state and federal investments in natural and working lands are providing climate benefits, but so too are regional and local investments. In the Bay Area, many of our public land agencies have passed significant funding measures with 2/3rds of the vote for natural resource protection, management and restoration. In some cases, it is actually local agency investments that leverage state and federal funds. Our agencies also provide significant co-benefits including: landscape-level protection and management of public lands, watershed protection, shoreline resiliency, protection of rangelands and grasslands, active transportation networks, recreational health benefits, economic benefits, wildlife corridors and habitats, and shoreline access.

Implementation strategy: Provide priority to agencies, regions, or counties that have enacted local natural resource funding measures.

#### Paved Trail Active/Green Transportation Network:

We appreciate the concept of sustainable communities programs being included in the 60% of continuous appropriations per SB 862 in 2014. We also very much appreciate the emphasis in the Draft Investment Plan on filling in the gaps in the sustainable communities and transportation infrastructure portfolio. In particular, we appreciate the fact that specified special districts, such as the East Bay Regional Park District, are included as potential recipients. As managers of over 200 miles of paved, non-motorized trails, which link the 33 cities of the East Bay together in an Active/Green Transportation Network, we wish to broaden the discussion about sustainable communities. Most interpretations of "a sustainable community" are that it is walkable and within a concentrated area. As interpreted by the Bay Area's Metropolitan Planning Organizations they are classified as Priority Development Areas which are dense, infill housing pockets within a subsection of a city, usually near a transit node. In order to truly maximize GHG reduction benefits through Active Transportation, we need to focus on connecting communities. Completing the trail gaps between communities should be a priority to improve and/or create a true alternative transportation network for the non-motorized movement of people. Of our 41 trail counters, which in fact demonstrate trail usage peaks during the morning and

evening commute hours, one located at the Pleasant Hill BART station has counted an increase of 50,000 annual users over the last five years. Multiply that out by 200 miles of paved trail and we have data to demonstrate a significant reduction in vehicle miles traveled. Regional agencies such as ours are able to complete non-motorized paved trail networks across jurisdictions.

Prioritizing investments to regional agencies should be considered.

Implementation strategy: Provide priority to connecting communities via non-motorized active transportation networks, with additional points considered for regional agencies that cross multiple jurisdictions.

#### Urban Greening:

We agree that increasing the urban tree canopy and expansion of green infrastructure - including wetlands restoration and watershed protection - plays an important role in sequestering carbon and increasing energy efficiency. We offer a slight expansion to the definition of traditional urban greening projects. The population of the two counties served by the Park District, Alameda and Contra Costa, is over 2.5 million. The Park

District has significant parks in highly urbanized parts of Oakland, Richmond and Fremont. Typically, District parks are more passive and not akin to neighborhood, pocket, or linear parks. They are in urban areas, but because of the size of some of our parks they don't feel like it. To effectively realize urban greening benefits in regional parks, the scale of these allocations need to be significantly increased. We believe the Urban Greening for Sustainable Communities Program, overseen by the Strategic Growth Council and administered by the Natural Resources Agency, should be expanded. We also support creating a 4-5% allocation for a Carbon-Smart Green Infrastructure Program to integrate more co-benefits into the Urban Greening for Sustainable Communities Program.

Implementation strategy: Develop two (or more) sets of criteria for urban greening grants, one of which recognizes larger scale projects in regional parklands that are within urban areas.

#### Wetland Creation and Coastal Resiliency:

With close to \$50 billion in homes, offices and infrastructure at jeopardy due to sea level rise in the Bay Area, we can ill afford to not consider resiliency in any Investment Plan related to climate change. Many of the East Bay's most disadvantaged communities are along the shoreline and vulnerable to sea level rise, including Richmond, Oakland, Hayward, etc. Wetlands creation and restoration provides known GHG reduction

benefits, and also improves watersheds and wildlife habitat.

Importantly, as is pointed out in the Draft Investment Plan, "they are the first line of defense against sea-level rise and storm surge, particularly in the fragile Delta region." We believe this should read, "particularly in the fragile San Francisco Bay-Delta region." The Park District has developed innovative, adaptive strategies for Bay and Delta shorelines - such as the multi-million dollar Breuner Marsh wetlands restoration investment in Richmond and the \$5.4 million sand

replenishment effort along Shoreline Drive in Alameda - which provide buffer zones for homes and infrastructure while providing multiple co-benefits to the region. Regulatory challenges, however, restrict rapid development and future opportunities for wetland restoration and creation along the Bay-Delta region. As the Baylands Ecosystem Habitat Goals Science Update of 2015 points out, at least eight state and federal agencies are likely to have a role

in the permitting process of Bay Area wetlands. In addition, wetlands restoration projects may need local authorization from cities or counties, and those that cross paths with railroad tracks, pipelines, highways and utilities need additional permission. Streamlined permitting mechanisms for wetlands restoration and creation are necessary. In addition, flexibility is needed for adaptive management of sites until best practices are truly understood. Also, flood-control channels need to be naturalized for both resiliency and water quality. Lastly, wetland restoration and creation projects which maximize carbon sequestration may not fully meet other habitat objectives that other regulatory agencies are charged with advancing.

Implementation strategy: Streamline permit processes and provide flexibility in project management for wetland restoration and creation efforts funded by GGRF appropriations.

#### Carbon Sequestration and Land Use Planning:

We agree with the Investment Plan's assertion that protecting natural lands from conversion to more carbon intensive uses, such as residential and commercial development, provides a high value to the state's overall GHG reduction goals. Based on an evaluation by ICF Jones & Stokes, the average amount of carbon sequestered by the Park District's lands is over 91,157 metric tons - the equivalent of removing 16,317 passenger cars and sport-utility vehicles from the road annually, saving approximately over 10.4 million gallons of gasoline. By preserving natural land in perpetuity, the District's parklands represent an important permanent carbon stock of over 2.8 million metric tons (estimates last updated in 2011). Additionally, our properties form natural boundaries encouraging more infill development that reduces vehicle miles traveled, infrastructure expansion and the associated GHG emissions. These lands, however, need proper management to retain sequestration value - particularly with regard to wildfire threats. We believe public natural resource management agencies should be awarded offset credit funds for continued stewardship. Further, we believe property owners should be incentivized for conveying or selling land to grow carbon stocks. Private property owners should benefit from conveying or selling property, not just granting easements, to natural resource agencies rather than for a more carbon-intensive use. We believe this can be addressed in the Gaps and Needs Assessment Natural and Working Lands comments on page 43 of the Investment Plan by stating "targeting investments toward private landowners with easements and/or as incentives for outright transfer of land ownership to natural resource agencies on forest, undeveloped and agricultural lands that are at risk of conversion." Implementation strategy: Provide annual offset credit funding for effective long term management and incentivize property transfers to natural resource agencies.

As is stated in the Draft Investment Plan, "there is a strong history of land conservation in California [and particularly in the East Bay] to protect wildlife, preserve agricultural viability, improve water supply and quality, and provide parks and open space for residents and visitors from around the world." The District concurs that California's lands "should be protected and managed wisely to reverse carbon loss, and to preserve and grow carbon stocks." To reach our collective goals, there must be significant investment from Cap-and-Trade proceeds in managing, maintaining and restoring our natural lands -

including the parks, open space, wetlands and rangelands of the East Bay.

Thank you again for your leadership on this issue. We look forward to continuing to work with you. Please feel free to contact us if you have any questions or would like additional support documentation.

Regards,  
Robert E. Doyle  
General Manager  
East Bay Regional Park District

cc: Governor Edmund G. Brown, Jr.  
The Honorable Matthew Rodriguez, Secretary, California  
Environmental Protection Agency  
The Honorable John Laird, Secretary, California Natural Resources  
Agency  
The Honorable Michael Cohen, Finance Director, California  
Department of Finance  
East Bay California Legislative Delegation  
EBRPD Board of Directors

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/34-investplan2-ws-VDgGZVMmWH8LaANx.pdf>

Original File Name: Letter - Nichols Cap-and-Trade Second Investment Plan 11-12-15.final.pdf

Date and Time Comment Was Submitted: 2015-11-12 17:01:34

No Duplicates.

**Comment 32 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Danielle  
Last Name: Lynch  
Email Address: danielle@caleec.com  
Affiliation: CALCC

Subject: CALCC Comments on ARB Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Comment:

Good Evening,

Please see attached comment letter on the Second Investment Plan on behalf of the California Association of Local Conservation Corps.  
Thank you for the opportunity to provide feedback.

Thank you,  
Danielle Lynch

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-investplan2-ws-VzQGYQFsUGADZgdY.pdf>

Original File Name: CALCC Comments II - ARB Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-11-12 16:55:22

No Duplicates.



**Comment 33 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Logan

Last Name: Olds

Email Address: lolds@vwra.com

Affiliation:

Subject: comment letter

Comment:

Please see attached comment letter. Thank You

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-investplan2-ws-UyVWJgZwWHkLbAlW.pdf>

Original File Name: VVWRA comment letter.pdf

Date and Time Comment Was Submitted: 2015-11-13 06:25:38

No Duplicates.

**Comment 34 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Staci

Last Name: Heaton

Email Address: sheaton@rcrcnet.org

Affiliation: Rural County Representatives of CA

Subject: Comments on the Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Comment:

Attached please find RCRC's comments on the Comments on the Draft Cap-and-Trade Auction Proceeds Second Investment Plan. Please contact me if you have any questions.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-investplan2-ws-AGMHYABxUV0LbAFv.pdf>

Original File Name:

Cap\_and\_Trade\_Auction\_Proceeds\_Draft\_Second\_Investment\_Plan\_Ltr\_to\_ARB\_11122015.pdf

Date and Time Comment Was Submitted: 2015-11-13 08:10:51

No Duplicates.

**Comment 35 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Rebecca

Last Name: Franklin

Email Address: rebeccaf@acwa.com

Affiliation: Association of California Water Agencies

Subject: Association of California Water Agencies Comments on Draft Second Investment Plan  
Comment:

Please find the Association of California Water Agencies comments on the Cap-and-Trade Auction Proceeds Draft Second Investment Plan attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/38-investplan2-ws-VDVVMFEnBDYGXwNg.pdf>

Original File Name: ACWA Comments on Draft Investment Plan (11132015).pdf

Date and Time Comment Was Submitted: 2015-11-13 09:04:47

No Duplicates.

## **Comment 36 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Steve

Last Name: Wallauch

Email Address: stw@platinumadvisors.com

Affiliation:

Subject: CTE Comments

Comment:

On behalf of the Center for Transportation and the Environment (CTE), I am submitting the attached comments on the draft Second Investment Plan.

If you have any questions or need additional information, please let me know.

Steve Wallauch

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-investplan2-ws-VDdXJQZiAAwBZAlo.pdf>

Original File Name: CTE CARB Ltr 11-5-15.pdf

Date and Time Comment Was Submitted: 2015-11-13 09:14:56

No Duplicates.

**Comment 37 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Steve

Last Name: Sanders

Email Address: ssanders@ca-ilg.org

Affiliation: Institute for Local Government

Subject: Comments on Cap & Trade Second Investment Plan

Comment:

Please see the attached comment letter submitted on behalf of the California State Association of Counties, the League of California Cities, and the Institute for Local Government.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-investplan2-ws-VTZTCgB1BQkKZQVr.doc>

Original File Name: C&T Investment Plan Joint Comment Letter Nov 2015 Final.doc

Date and Time Comment Was Submitted: 2015-11-13 09:15:35

No Duplicates.

## **Comment 38 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Sharon

Last Name: Danks

Email Address: Sharon@greenschoolyards.org

Affiliation: Green Schoolyards America

Subject: Sustainable communities cannot be achieved without including public schools

Comment:

Dear California Air Resources Board,

We are writing to express support for Green Schools Initiative's recommendation that "K-12 public schools be included as an urgent investment priority for Greenhouse Gas Reduction Fund investments in ARB's draft Three Year Investment Plan." Green Schoolyards America signed a group letter submitted by Green Schools Initiative, and we wish to add additional information to further explain the value of directing a portion of your green infrastructure investments to school grounds in a "Sustainable Schools Grant Program".

Green Schoolyards America's mission is to inspire and enable communities across the United States to enrich their school grounds and use them to improve children's well-being, learning and play while promoting community engagement and contributing to the ecological health and resilience of cities.

Public school districts are one of the largest landowners in almost every city and town across the United States and around the world. In California alone, over 10,300 schools in more than 1,000 school districts serve more than 6 million pre-kindergarten to 12th grade students each year, on more than 125,000 acres of publicly-owned land. Choices made by school districts about how they manage their buildings and grounds profoundly impact their cities and generations of residents across our state whose perspectives are shaped through daily experiences at school.

The green school ground field is gaining momentum around the world, weaving the ideas of urban sustainability, climate change mitigation and ecological design together with academic achievement, public health, children's well-being, sense of place, and community engagement. Green schoolyards bring nature back to cities and suburbs by transforming barren asphalt and ordinary grass into vibrant places for learning and recreation, set within the context of the rich, local ecosystems that nurture wildlife and the natural processes that underlie and sustain our urban environment.

The California state government passed a resolution in 2014 (ACR-128, Ting), recognizing the importance of improving ecological infrastructure on land managed by public schools and connecting it to children's academic achievement and health. The resolution urges "the State Department of Education, school districts, county offices of education, and charter schools to continue to prioritize

the design and construction of student-accessible green space on school campuses and to integrate use of this space into the teaching of standards based curriculum." We believe that investments from the Greenhouse Gas Reduction Fund should be used to help public school districts build outdoor park-like spaces that serve both as green infrastructure and benefit the local community and students. Sustainable communities cannot be achieved without including schools in the planning process.

Most of California's urban school grounds are covered with asphalt and concrete that have high surface temperatures, often 20 to 40 °C hotter than vegetated areas. Heavily paved campuses—most common in disadvantaged communities—contribute directly to urban heat island effects and atmospheric warming, and create unhealthy conditions for children. Paved, impermeable surfaces also carry polluted runoff into our natural water systems. By removing schoolyard asphalt, planting trees, and allowing stormwater to infiltrate onsite, surface temperatures can be decreased, carbon can be sequestered in the soil, and financial savings can be achieved through reduced reliance on municipal water and sewage treatment. These improvements, if placed in student-accessible locations on school campuses, also greatly improve children's experience at school.

Investing in green infrastructure on school grounds is a way to address climate change equitably, while bringing nature to parts of our cities that lack green space. Studies have shown that exposure to nature reduces stress, aids social cohesion and helps students' concentration and academic achievement. Air quality problems are also of particular concern for schools since children's smaller body size, faster metabolism and weaker immune systems leave them particularly vulnerable to ozone, carbon and particulate matter (PM10). Several studies correlate the increased presence of these elements with increased sick days for local school children.

Green school grounds benefit students, their schools, and their communities in the short-term by increasing physical activity, promoting healthy food choices, and providing valuable hands-on experiences in outdoor classroom settings, while making the physical environment more resilient, healthy, comfortable and enjoyable. The long-term benefits of green schoolyards multiply over time: Not only are they highly visible community hubs, but by incorporating stewardship and environmental education into the physical school grounds and school curricula, students grow up to become adults who care for their environment.

Our future needs citizens who understand complex environmental issues and can help to find solutions to ongoing problems. Investing in climate change mitigation measures on school grounds will help solve the growing climate problems we now face, while also preparing our children to be the environmental leaders of tomorrow.

Thank you for considering our perspective on including schools as part of California's solution for mitigating climate change.

Sincerely,  
Sharon Danks  
CEO, Green Schoolyards America  
Berkeley, CA  
[sharon@greenschoolyards.org](mailto:sharon@greenschoolyards.org)

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-investplan2-ws-UDEBZVxuAmNWD1A3.pdf>

Original File Name: AB32\_GSA-Comments.pdf

Date and Time Comment Was Submitted: 2015-11-13 09:22:20

No Duplicates.



## **Comment 39 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Anna

Last Name: Ferrera

Email Address: aferrera@m-w-h.com

Affiliation: School Energy Coalition

Subject: Cap and Trade Auction Trade Proceeds Investment Plan

Comment:

Dear Air Resources Board:

On behalf of the School Energy Coalition (SEC), an organization made up of K-14 schools and associate members focused on improving energy and water efficiency in school facilities for California's students, I am writing to provide our comments on the Cap and Trade Auction Trade Proceeds Investment Plan.

With over 10,000 school buildings in over 1,000 school districts throughout the state we believe schools should be key partners in assisting the state to meet greenhouse gas reduction targets. According to the Collaborative on High Performing schools (CHPS), one in five Californians spends their day in a K-12 school and schools contribute roughly 5-8% of California's greenhouse gas emissions. SEC believes that a new energy and water school grant program should be considered along with technical assistance for schools who wish to build upon the energy efficiency work they are doing with the Proposition 39 program.

Baseline data, analysis, and benchmarking are being done now but the allocations do not allow schools to do the deep retrofits that are needed to make a difference statewide. Schools are poised to do so much more with regard to efficiency and renewables - and now more than ever - Zero Net Energy schools seem attainable.

Energy projects not only directly lower greenhouse gas emissions but also save taxpayer dollars that can be used on other school priorities or be re-invested in upgrading buildings to new Green code and Title 24 standards.

Water projects should also be a priority because we know that it takes an extraordinary amount of energy to move water up and down the state. Public school districts are often in charge of many acres of lawn in cities and towns across the state - and have been identified as large water users by water districts.

Projects that conserve or more efficiently use or re-use water will also contribute greatly to lowered greenhouse gas emissions and educating the users of tomorrow, our students. Schools are already struggling to meet the state's emergency water mandates while keeping up playfields and ensuring that they are safe for students and other community members who may share these facilities.

In addition, funding for addressing long-term ongoing water use

through landscaping and infrastructure - such as purple pipe - could go a long way toward allowing schools to take real, permanent action and save millions of gallons of water annually. We are also able to easily identify those schools in disadvantaged communities through our free and reduced price meal data.

Finally, we ask that a thorough review of existing energy, water and transportation programs be made to ensure that school projects have priority access or separately designated funding under the plan. Schools already have state agency partnerships with the Department of Education, the California Energy Commission, and now the Water Board on programs such as Prop 39 and the Drought Response Outreach Program for Schools (DROPS).

Schools are a sure way to ensure that every community has public projects that they can be proud of and teaches consumers of tomorrow about conservation and efficiency to address climate change. We look forward to working with you to ensure that schools are an active part of the plan to lower greenhouse gas emissions throughout California.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-11-13 09:28:53

No Duplicates.

**Comment 40 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Julia

Last Name: Levin

Email Address: jlevin@bioenergyca.org

Affiliation: Bioenergy Association of California

Subject: Comments on Draft Investment Plan on Cap and Trade

Comment:

Attached please find the Bioenergy Association of California's comments on the Draft Investment Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/43-investplan2-ws-UzEAZ1MxAg4AagJn.pdf>

Original File Name: BAC Letter on Draft Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-11-13 09:28:50

No Duplicates.

**Comment 41 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Gerard  
Last Name: Nijhoving  
Email Address: sales@sunoil-biodiesel.com  
Affiliation:

Subject: Comment GGRF  
Comment:

Please find our comment in the attachment.  
Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/44-investplan2-ws-B3RdLIM8V2sAb1Q4.pdf>

Original File Name: Sunoil Biodiesel Comment GGRF 13 Nov 2015.pdf

Date and Time Comment Was Submitted: 2015-11-13 09:28:38

No Duplicates.

**Comment 42 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Rachel

Last Name: Saunders

Email Address: rsaunders@bigsurlandtrust.org

Affiliation:

Subject: Big Sur Land Trust Comments - Natural & Working Lands

Comment:

Hello,

Attached is Big Sur Land Trust's comments on the Cap-and-Trade Auction Proceeds Draft Second Investment Plan. Thank you for the opportunity to provide public comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/45-investplan2-ws-AmBUIQNWH8BWFQ9.pdf>

Original File Name: BSLT Investment Plan Comments 11.13.15.pdf

Date and Time Comment Was Submitted: 2015-11-13 09:37:24

No Duplicates.

## **Comment 43 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Susan

Last Name: Silber

Email Address: susansilber07@gmail.com

Affiliation:

Subject: K-12 schools in its Three Year Investment Plan and be eligible for state grants and funds

Comment:

Please include K-12 schools in its 3-years investment plan!  
Schools should be models of sustainability. There a huge dearth of funding for environmental education in schools. This would be a huge boost for funding opportunities. Students could be learning about and actively participating in ways to make their schools and state more sustainable.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-11-13 09:42:15

No Duplicates.

**Comment 44 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Julee

Last Name: Malinowski Ball

Email Address: julee@ppallc.com

Affiliation:

Subject: CBEA Comments on Cap-and-Trade Auction Proceeds Second Investment Plan  
Comment:

On behalf of the California Biomass Energy Alliance, attached please find comments on the Cap and Trade Auction Proceeds Second Investment Plan ("Plan"). Thank you for your kind attention and consideration.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/48-investplan2-ws-VDcAZ1cmBQkCZQln.pdf>

Original File Name: Cap and Trade Auction Proceeds Second Investment Plan (Final 11-13-2015).pdf

Date and Time Comment Was Submitted: 2015-11-13 10:38:57

No Duplicates.

## **Comment 45 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Laura  
Last Name: Muraida  
Email Address: lmuraida@scopela.org  
Affiliation: SCOPE

Subject: Draft Cap-and-Trade Auction Proceeds Second Investment Plan  
Comment:

November 11, 2015

Chair Mary Nichols and Board Members  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Dear Chair Nichols and Board Members:

On behalf of Strategic Concepts in Organizing and Policy Education (SCOPE), I would like to thank the Air Resources Board (ARB) for providing the opportunity to give feedback on the Draft Cap-and-Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19. We greatly appreciate the ARB's ongoing efforts to incorporate the public's recommendations into the Plan's priorities.

SCOPE is a 22-year-old community organization based in South Los Angeles that has worked over the past 10 years to create replicable models for targeted training and career-path job opportunities for disadvantaged workers in the climate and green jobs sector. We are currently working with other South Los Angeles-based organizations through the Los Angeles Equity Alliance to ensure equitable investment and full integration of low-income communities in climate resilience efforts and high-road green job creation.

As the agency tasked with identifying priorities to help achieve greenhouse gas (GHG) emission reduction goals, maximize benefits to disadvantaged communities, and yield valuable co-benefits, we believe that the ARB's recommendations would be strengthened by providing more emphasis on job growth and workforce development benefits—a key post-2020 implementation strategy identified by State agencies. Our comments focus on specific areas in which the ARB can incorporate the issue of job creation and workforce development—in relation to disadvantaged workers in particular—in the overarching strategies to transition to a low-carbon economy.

Recommendations:

1. Include job creation & workforce development in the assessment of gaps and needs  
Including a better gap and needs assessment related to job creation



and workforce development can help ensure that future programs maximize economic benefits, foster job creation, and direct investment toward the most disadvantaged communities in the state. Reaching the State's long-term goals will require significant policy, development and industry shifts, and understanding the workforce and training needs of the new clean energy economy is imperative. Such an assessment should also explicitly look at potential job creation and economic co-benefits to disadvantaged workers.

2. Intentional investment in job creation and training programs  
Under each investment concept, the ARB should discuss potential job creation and training opportunities. Given the strong policy mandate to maximize job creation, particularly among the state's disadvantaged workers, the ARB should provide additional context on job creation for decision-makers. Where possible, the Plan should highlight industries where successful and scalable training models and career-pipelines exist.

3. Research, development and deployment of innovative workforce and targeted training strategies related to Cap-and-Trade funded programs and projects

The Plan should prioritize investment in innovative program models that develop successful job placement and training opportunities using concrete workforce indicators and metrics in conjunction with GHG emission reduction benefits. Research and development support are needed to ensure targeted-hiring, training, and new career-track job development models go hand-in-hand with GHG reductions. Training investments will not only lead to a higher skilled workforce, but have been proven to produce more effective greenhouse gas reduction outcomes. Additionally, thoughtful investment in successful job and targeting models will help low-skilled, incumbent, and disadvantaged workers access jobs in the growing clean energy economy, ensuring it is inclusive and accessible to all California's workers.

4. Integrating complementary jobs and workforce recommendations in future program guideline development

These recommendations require better coordination between the ARB, which develops investment priorities and funding guidelines, and the agencies administering program funds, so that investments in training and project performance goals can be tracked and evaluated and concrete job and training goals can be set. Integrating these recommendations into the Second Investment Plan will ensure that additional workforce-related recommendations at the program guideline-level are more effective.

We appreciate the opportunity to share our comments and we thank you for all the work your agency has done to implement these important programs. I am available to discuss our workforce models and our recommendations more in depth. Please feel free to reach out with any questions or if you would like more information. We look forward to working with you to ensure that our state's most disadvantaged workers and their families are able to benefit from these investments.

Sincerely,

Laura Muraida  
Research Director

Strategic Concepts in Organizing & Policy Education (SCOPE)

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-investplan2-ws-B3QCZwZoBCdRMIMM.docx>

Original File Name: SCOPE ARB Investment Plan Comment Letter FINAL.docx

Date and Time Comment Was Submitted: 2015-11-13 11:07:47

No Duplicates.

**Comment 46 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Ryan

Last Name: Kenny

Email Address: ryan.kenny@cleanenergyfuels.com

Affiliation: Clean Energy

Subject: Cap and Trade Second Investment Plan

Comment:

Please find attached a letter from Clean Energy commenting on the Cap and Trade Auction Proceeds Second Investment Plan. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-investplan2-ws-UDNSOABvVmAHXgBj.pdf>

Original File Name: CLNE Comments Draft Second Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-11-13 11:25:43

No Duplicates.

**Comment 47 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Michelle

Last Name: Passero

Email Address: mpassero@tnc.org

Affiliation: The Nature Conservancy

Subject: Comments from The Nature Conservancy on the Draft Three Year Investment Plan  
Comment:

Please accept the attached comments from The Nature Conservancy on the Air Resources Board Draft Three Year Investment Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/51-investplan2-ws-Wy8Hb1w+AyMDYARn.pdf>

Original File Name: TNCSecondInvestmentPlanComments\_final11\_13\_15.pdf

Date and Time Comment Was Submitted: 2015-11-13 11:30:08

No Duplicates.

**Comment 48 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Hannah  
Last Name: Goldsmith  
Email Address: hannah@caletc.com  
Affiliation: CalETC

Subject: CalETC Comments Re: DRAFT Cap-and-Trade Auction Proceeds, Second Investment Plan

Comment:

Please find CalETC comment letter attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-investplan2-ws-AWJVMlc6AzUKeARn.pdf>

Original File Name: CalETC Comments Re Cap-and-Trade Auction Proceeds - Draft Second Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-11-13 11:28:55

No Duplicates.

**Comment 49 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Derek

Last Name: Benson

Email Address: dbenson@energysource.us.com

Affiliation:

Subject: EnergySource comments re Second Investment Plan

Comment:

EnergySource appreciates the opportunity to file these comments regarding the Second Investment Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-investplan2-ws-VzQFbV0oVloKYFA5.pdf>

Original File Name: CNT Lithium Eligibility Filed 11\_13.pdf

Date and Time Comment Was Submitted: 2015-11-13 11:32:07

No Duplicates.

## **Comment 50 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: John

Last Name: Hopkins

Email Address: ieh@cal.net

Affiliation: California HCP Coalition

Subject: Need for a Habitat Lands Conservation component

Comment:

Thank you for this opportunity to comment on behalf of the California Habitat Conservation Planning Coalition, whose members include local government led conservation plans across the state, NGOs and businesses.

The draft plan includes a very important natural resources component - "conservation and improved management strategies for achieving net climate benefits and long-term carbon sequestration on natural and work lands" (Figure ES-1 and Figure 10, page 28). It recognizes that "protection and sustainable management of these lands and resources to develop resilient carbon storage will be pivotal in meeting climate goals" (Page 3). It states that "Investment in resilient carbon storage across all land types is of particular importance"(Page 43). The Targets and Goals for the Second Investment plan (Figure 15, page 42) states "protect, restore and manage natural and working lands so they store carbon and provide net GHG benefits."

These statements recognize the importance of natural lands in meeting state GHG goals, and that this includes all land types.

However, the current natural resources components only address a subset of these lands. The components are Healthy Forests (forest health restoration, forest legacy and land conservation and urban forestry) (page A-7); Wetlands and Watershed Restoration (Delta and coastal wetlands, mountain meadows habitat and water efficiency on CDFW lands) (page A-7); and Agricultural Land Preservation (page A-4).

Missing from this suite of actions is the preservation of Habitat Lands such as oak woodlands, chaparral, coastal scrub and desert lands, key areas for meeting the long-term GHG reduction targets.

Creation of a Habitat Lands Conservation component, focused on the protection of lands threatened by conversion such as suburban development, needs to be a major item in the Second Investment Plan.

These other habitats have very extensive stored carbon, especially soil carbon (Potter, 2010), much of which is lost when development conversion occurs. In addition, they are often ongoing carbon sinks, or can become carbon sinks through management measures. Scientific studies are increasingly showing the importance of these lands for addressing GHG levels. (See examples of recent scientific and technical findings below).

Programs such as large landscape-scale Natural Community Conservation Plans and Habitat Conservation Plans offer excellent opportunities which the Second Investment Plan should use. These programs include development of preserve management plans, plus in perpetuity monitoring and management and are highly leveraged. They will allow for management that protects already stored carbon and maximizes opportunities for additional carbon sequestration.

Comment on specific items in the draft Second Investment Plan

Figure 2, page 6. Last item (carbon storage)  
Please add "and other natural lands" after "rangelands"

Figure 16, page 45, third bullet item  
Please add " and fee title acquisition" after "conservation easements".

There are various situations where natural lands important for carbon sequestration and threatened by development can only be protected by fee title easement. It is our understanding that there are concerns about whether fee title acquisition properly protects natural lands. In fact it does, at least with NCCPs and HCPs, as the acquisition process includes restrictions that protect the land in perpetuity and prohibit conversion. Also management plans and adaptive management programs for fee title acquisition lands will ensure protection of existing soil carbon and maximize future carbon sequestration.

Some recent scientific and technical findings

There have been measurements of carbon fluxes at a few California non-forest locations; grasslands, oak savanna, and southern California chaparral. In dry years, rangelands are often a carbon sink, absorbing more carbon than is emitted into the atmosphere by respiration. There is data showing that natural lands with woody vegetation, including oak woodlands and chaparral, are net carbon sinks. For example, Liu et. al. (2012) determine that grasslands and shrublands in Mediterranean climate California are a carbon sink ( -6.4 to +0.3 teragrams of carbon a year for the entire area). Silver (2009) and DeLonge et. al. (2014) state that California rangelands have the potential for considerable carbon sequestration in the soil. Baldocchi (2009) states that oak woodlands are carbon sinks ( - 92 +/- 43 gms carbon per square meter per year). A mature, 100 year old growth chamise chaparral stand was found to sequester 58 grams of carbon per square meter per year on average over a seven-year period (Luo et.al. 2007). Walter Oechel and colleagues at San Diego State University have conducted broader studies on Southern California Chaparral and concluded that chaparral ecosystems are a significant carbon sink. (Oechel, 2013)

The loss of natural ecosystems is severe and ongoing. For example, Liu et al (2012) projected that 17 percent of the grassland and shrubland areas in California's Mediterranean climate region will be lost to conversion between 2005 and 2050. The major causes are urban/suburban/rural development and conversion to orchards and vineyards. Essentially all of the remaining coastal sage scrub habitat in southern California that is not protected as conservation land (primarily through Natural Community Conservation Plans) will be lost to suburban and rural development. All of



these conversions will result in substantial release of CO<sub>2</sub> into the atmosphere. For example, conversion of natural ecosystems to agricultural land results in loss of 25 to 50 percent of the original organic carbon (Lal, 2001).

When natural and working lands are converted to urban / suburban or rural development there are two carbon impacts. The first is loss of vegetation and soil carbon from land clearing and grading. The second is long term increased carbon emissions by vehicles and other uses in the developed areas. For example, a recent UC Davis study of Yolo County shows that the annual carbon emissions level of urban lands is 219-fold higher than rangelands and 70-fold higher than irrigated croplands (Jackson et al, 2012).

## References

Baldocchi D. (2009) Carbon and Water Exchange of an Oak-grass Savanna and Peatland Pasture Ecosystem. Berkeley Faculty Roundtable on Environmental Services in Rangeland Production systems. March 20 2009. University of California, Berkeley.

DeLonge MS, Owen JJ and Silver WL. (2014) Greenhouse Gas Mitigation Opportunities in California Agriculture: Review of California Rangeland Emissions and Mitigation Potential. Nicholas Institute GGMCA R 4. Durham, NC: Duke University

Jackson L. et.al. (2012) Adaptation Strategies for Agricultural Sustainability in Yolo County, California. California Energy Commission Publication number: CEC-500-2012-032.

Lal R. (2001) World Cropland Soils as a Source or Sink for Atmospheric Carbon, *Advances in Agronomy*. 71:145-191.

Liu S. et. al. (2012) Baseline and Projected Future Carbon Storage and Greenhouse-Gas Fluxes in Ecosystems of the Western United States. In Zhu S and Reed BC, eds. Baseline and Projected Future Carbon Storage and Greenhouse-Gas Fluxes in Ecosystems of the Western United States. Chapter 5. U.S. Geological Survey Professional Paper 1797. Reston VA.

Luo H. et.al. (2007) Mature Semiarid Chaparral Ecosystems can be a Significant Sink for Atmospheric Carbon Dioxide. *Global Change Biology*. 13:386-396.

Oechel W. (2013) The Effects of Climate Change: Elevated CO<sub>2</sub>, Climate Variability, and Fire, on the Functioning and Atmospheric Feedbacks of Chaparral of Southern California and the Desert of Baja California, Mexico. Powerpoint presentation. February 6 2013.  
[www.otmed.fr/IMG/pdf/Walter\\_Oechel\\_06\\_February\\_2013.pdf](http://www.otmed.fr/IMG/pdf/Walter_Oechel_06_February_2013.pdf)

Potter C (2010) The Carbon Budget of California. NASA Publications 81 <http://digitalcommons.unl.edu/nasapub/81>

Silver WL, Ryals R and Eviner V. (2010) Soil Carbon Pools in California's Annual Grassland Ecosystems. *Rangeland Ecology and Management*. 63:128-136.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-11-13 12:06:51

No Duplicates.

**Comment 51 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Paolo  
Last Name: Carollo  
Email Address: paolo.carollo@betarenewables.com  
Affiliation: Beta Renewables USA, Inc.

Subject: INVESTPLAN2-WS  
Comment:

Please see the attached letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/55-investplan2-ws-UTgFbQdwVmBXIgJ2.pdf>

Original File Name: INVESTPLAN2-ws betarenewables.pdf

Date and Time Comment Was Submitted: 2015-11-13 13:17:05

No Duplicates.

**Comment 52 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Mary  
Last Name: Creasman  
Email Address: Mary.Creasman@tpl.org  
Affiliation: The Trust for Public Land

Subject: The Trust for Public Land's comments on the Second Cap and Trade Investment Plan  
Comment:

Dear Ms. Nichols,

Please find attached The Trust for Public Land's comments on the Cap and Trade Auction Proceeds Draft Second Investment Plan. Thank you very much for the opportunity to comment.

Sincerely,

Mary Creasman

Director of Government Affairs  
The Trust for Public Land

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/56-investplan2-ws-BmFWNwFyVGEBdAVg.pdf>

Original File Name: GGRFSecondtInvestmentPlanletter\_TPL\_11.13.2015\_final.pdf

Date and Time Comment Was Submitted: 2015-11-13 13:28:25

No Duplicates.

**Comment 53 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Julie

Last Name: Tran

Email Address: julie@oit.ucla.edu

Affiliation: Smart Manufacturing Leadership Coalition

Subject: Smart Manufacturing Letter

Comment:

Hello,

Please see the attached letter from Jim Wetzell, Chair of the Smart Manufacturing Leadership Coalition (SMLC) Board.

Thank you,

Julie Tran,  
Program Manager, SMLC

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/57-investplan2-ws-AXJVPIM+VWVRCAIq.pdf>

Original File Name: SMLC CA ARB Letter.pdf

Date and Time Comment Was Submitted: 2015-11-13 13:34:26

No Duplicates.

**Comment 54 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Graham

Last Name: Noyes

Email Address: gnoyes@kfwlaw.com

Affiliation: Keyes Fox Wiedman LLP

Subject: InvestPlan2-WS, Comments Submitted on Behalf of Sierra Energy

Comment:

Attached please find comments regarding the Cap-and-Trade Auction Proceeds Second Investment Plan submitted on behalf of Sierra Energy. Please contact me if there are any difficulties in opening the attachment or if there are any questions regarding these comments.

Thank you for your assistance.

Best Regards,

Graham Noyes

Keyes, Fox & Wiedman LLP

980 Ninth Street, 16th Floor

Sacramento, CA 95814

(530)264-7157 Direct

Licensed to Practice in California, Washington and the District of Columbia

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/58-investplan2-ws-VCCAb1A0AiMGclU0.pdf>

Original File Name: SierraEnergy ARB GGRF Comments 13 Nov 2015 Submitted.pdf

Date and Time Comment Was Submitted: 2015-11-13 13:40:27

No Duplicates.

## **Comment 55 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Tom

Last Name: Knox

Email Address: tom.knox@valleycan.org

Affiliation: Valley Clean Air Now

Subject: GGRF Spending Plan comments

Comment:

Attached and pasted below are Valley Clean Air Now's comments on the Cap-and-Trade Auction Proceeds Second Investment Plan

Tom Knox  
tom.knox@valleycan.org  
916-715-6310

Valley Clean Air Now Comments on  
Cap-and-Trade Auction Proceeds Second Investment Plan

Thank you for the opportunity to comment on the Draft Second Investment Plan. We are heartened to see the Air Resources Board's commitment to creating meaningful change in disadvantaged communities through reinvestment of Cap and Trade funds and offer the following comments and suggestions:

Support for Cross Cutting Approaches. Section VI, Current Strategy Gaps and Draft Investment Concepts is an excellent approach to continue to evolve the planning process in order to achieve effective carbon reduction investments and economic returns.

Specifically, the idea of using "cross-cutting approaches" to streamline program delivery can create momentum toward maximum environmental, economic, and public health benefits in disadvantaged communities. By preferentially funding projects with achieve multiple benefits, a suggestion that has been made by the independent Legislative Analyst's Office as well as by many stakeholders, the state can make the most use of the funds it has been tasked with reinvesting. In addition, we believe that it is possible, and highly advantageous, to stack multiple GGRF-funded programs within disadvantaged community households, creating transformative change in these communities. For instance, Valley Clean Air Now coordinates with Fresno EOC to make solar installations available for low-income residents who qualify for incentives for a battery electric vehicle.

Enable Program Coordination Through Unified Applicant Management & Program Analytics. Attempting to align programs at the agency level may be difficult due to relatively small differences in quantification methodologies, approach, and guideline requirements, which is amplified by the number and breadth of agencies involved. As a potential solution we recommend including a third section under Section VI. A. Potential Cross Cutting Approaches for Program Design and Structure. Based on our experience with operating EFMP

Plus-Up in the San Joaquin Valley, we believe there is an opportunity to coordinate at the program level using a universal customer application and reporting system as the basis for cross-program coordination that can streamline the intake and eligibility verification process and ensure that consistent reporting metrics are used. This avoids the need to alter existing statutes and program guidelines and allows for coordination at the grassroots level where it is most needed. Cross-program coordination can include most aspects of program design:

- Outreach
- Education and activation
- Program delivery
- Accounting
- Reporting

The key element of this approach is that it would allow agencies to stack GGRF programs for a single customer or community, creating ease of access and utilization for the general public. The universal application and reporting system can be developed as a common application usable by most, if not all, GGRF programs. This common application could collect basic information broad enough to cover all programs, with modules specific to the needs of each issue area based on a constituent's interest or qualifications. This way the same application could work for all program types, with each program able to use the core application plus the modules that meet their specific needs.

It would be a relatively straightforward process to assess each GGRF program for opportunities to coordinate with other programs, and map these potential interconnections. This coordination can cross between similar program types, such as various clean transportation and transit programs within CARB's Clean Transportation Funding stream which share commonalities, or between agencies where alignment can be encouraged across housing, transportation, clean energy, energy efficiency, natural resources and waste diversion programs. As new programs are developed, agencies can offer new opportunities for program stacking and continue to build out the universal application.

Deep Outreach in Disadvantaged Communities and Rural Areas. A universal application and reporting system approach could also help to alleviate the challenges with outreach in disadvantaged communities and rural areas. A common application system, designed to be inclusive of the needs of disadvantaged residents, will lower barriers to participation and make GGRF programs appear more attractive and understandable to these residents. Based on our first-hand experience establishing a successful program for rural and disadvantaged communities in the San Joaquin Valley, outreach will not be effective in these communities unless perceived barriers are eliminated and the application process is made as simple as possible. Valley CAN has developed a universal screening mechanism, similar to the universal application, which allows our organization to guide participants through the application process and reduce the complexity which acts as a barrier to participation.

Given the San Joaquin Valley's leadership and experience in establishing integrated programs focused on disadvantaged and rural communities, the Valley could host a pilot to test this approach and report back to the Air Resources Board on successes and further barriers which may need to be addressed. Program administrators in the Valley have already conducted early meetings and forged



agreements to begin working together on participant outreach, screening, and reporting which would allow this pilot to begin as early as January 2016.

Thank you for considering these comments. Please contact Tom Knox at [tom.knox@valleycan.org](mailto:tom.knox@valleycan.org) or (916) 273-8886 if you need any additional information.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/59-investplan2-ws-AnRWMV0wUm1QMwN6.pdf>

Original File Name: Valley Clean Air Now Comments on GGRF Draft Second Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-11-13 13:43:45

No Duplicates.

**Comment 56 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Janice

Last Name: Lin

Email Address: jlin@storagealliance.org

Affiliation:

Subject: CESA's comments on the draft 2nd Triennial C&T Investment Plan

Comment:

The California Energy Storage Alliance respectfully submits the following comments on the draft Second Triennial Cap and Trade (C&T) Investment Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/60-investplan2-ws-UjNdKVY1UV0EMAFv.pdf>

Original File Name: ARB 2nd Investment Plan CESA Comments FINAL.pdf

Date and Time Comment Was Submitted: 2015-11-13 13:56:09

No Duplicates.

**Comment 57 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Rachael  
Last Name: O'Brien  
Email Address: rachael@agcouncil.org  
Affiliation: Ag Council

Subject: Draft Cap-and-Trade Auction Proceeds Second Investment Plan  
Comment:

Ag Council appreciates the opportunity to submit comments on the Draft Cap-and-Trade Auction Proceeds Second Investment Plan. Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/61-investplan2-ws-WilRMgZkAz9WPgBk.pdf>

Original File Name: SecondInvestmentPlan\_AgCouncil\_Nov2015.pdf

Date and Time Comment Was Submitted: 2015-11-13 13:57:34

No Duplicates.

**Comment 58 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Adam

Last Name: Kotin

Email Address: adam@calclimateag.org

Affiliation: California Climate & Agriculture Network

Subject: Comments of California Climate & Agriculture Network (CalCAN)

Comment:

In the attachment you will find the comments of the California Climate & Agriculture Network (CalCAN). Thanks.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/62-investplan2-ws-AmFXMARpAjJXMAFv.pdf>

Original File Name: CalCAN Investment Plan Comments – 11-13-15.pdf

Date and Time Comment Was Submitted: 2015-11-13 13:40:22

No Duplicates.

## **Comment 59 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Jerry

Last Name: Davies

Email Address: jerrydavies55@gmail.com

Affiliation: California Fire Safe Council

Subject: Invest in Healthy Forests and Watersheds with California Fire Safe Council

Comment:

The Board of Directors of California Fire Safe Council (Board) urges the Air Resources Board to focus cap and trade auction proceeds to support healthy forests and watersheds across California. Particularly, the Board expresses the urgent need for funding for fuel reduction and hazard mitigation projects in areas hardest hit by the drought-related tree mortality.

On October 30, 2015, Governor Edmund G. Brown declared a state of emergency in response to the widespread tree mortality caused by severe drought conditions and epidemic pest infestations. As California endures its fourth year of extreme drought conditions, immediate action must be taken to remove dead and dying trees from the landscape to reduce the risk to public safety and infrastructure.

Funding is urgently needed for fuel reduction and hazard mitigation projects in areas hardest hit by the drought-related tree mortality. CFSC offers its reputable Grants Clearinghouse as an efficient vehicle for delivering wildfire prevention and hazard mitigation funds for work on private and non-federal land to tackle the issue.

As a statewide 501(c)(3) non-profit organization, CFSC supports and advocates on behalf of over 200 local Fire Safe Councils and Firewise Communities. Since 1993, CFSC has worked in partnership with the federal fire agencies as well as CAL FIRE, local fire districts, insurance companies, utilities and local citizens. CFSC receives fire prevention grants from federal agencies to provide subgrants to Fire Safe Councils, fire departments, resource conservation districts and other organizations to implement hazardous fuel reduction projects, wildfire mitigation planning, and community education and outreach programs across California.

Since 2004, the innovative Grants Clearinghouse funding mechanism has awarded over 900 grants totaling more than \$85 million, thanks to financial support from the U.S. Forest Service, Bureau of Land Management, National Park Service, and U.S. Fish and Wildlife Service. In total, these dollars have protected 2,450,000 homes and 10,300,000 residents. However, current funding only allows CFSC to fund 30% of the applications it receives for hazardous fuel reduction projects and community education and planning programs throughout the state. Each year, dozens of quality projects go unfunded leaving communities without vital fire prevention and mitigation work.

The U.S. Forest Service estimates that over 22 million trees are dead and tens of millions more are likely to die by the end of the year. Southern California Edison reports that over 200,000 dead and dying trees currently impact powerlines and infrastructure within its territory. Pacific Gas & Electric has also experienced unprecedented tree mortality along its overhead, electric distribution system - with 2015 totals nearly 100% above its 2010-2014 five-year average.

CFSC expresses grave concern that the dead and dying trees across the state pose a direct threat to homes and infrastructure. This is a public safety concern that needs to be addressed through immediate removal of the hazardous vegetation. Projects funded through the Grants Clearinghouse involve hazardous fuels reduction throughout the state's forests and wildland urban interface to mitigate the impact of wildfire on communities. The projects are linked to approved community wildfire protection plans (CWPP) and fire management plans. Many projects have the dual benefit of removing excess fuel, small trees and undergrowth, producing biomass material which can be utilized for energy production.

The Board thanks the Air Resources Board for the opportunity to submit comments in response to the Draft Second Investment Plan for cap and trade auction proceeds. We look forward to viewing the final version of the plan in the governor's budget in January.

Sincerely,

/s/ Jerry Davies  
Chairman / CEO  
jerrydavies55@gmail.com  
(805) 559-0082

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-11-13 14:23:21

No Duplicates.

**Comment 60 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Susan

Last Name: Carroll

Email Address: carroll6@llnl.gov

Affiliation: Lawrence Livermore National Laboratory

Subject: Negative Carbon Energy

Comment:

See uploaded file.

Carroll\_InvestmentPlan\_13Nov2015.pdf

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/65-investplan2-ws-AWJWMVQnBSQBaFc7.pdf>

Original File Name: Carroll\_InvestmentPlan\_13Nov2015.pdf

Date and Time Comment Was Submitted: 2015-11-13 14:32:48

No Duplicates.

## **Comment 61 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Dan

Last Name: Noble

Email Address: danwyldernoble@gmail.com

Affiliation: Association of Compost Producers

Subject: GGRF Second Investment Plan Comment Letter

Comment:

Attached please find our comment letter from the Association of Compost Producers. Thank you for the opportunity to comment.

Sincerely,

Dan

Dan Noble, Executive Director

Association of Compost Producers

The Calif. State Chapter of the US Composting Council

"We Build Healthy Soil" - [www.HealthySoil.org](http://www.HealthySoil.org)

<http://compostingcouncil.org/icaw/> - [www.Buy-Compost.com](http://www.Buy-Compost.com)

Cell/text: (619) 992-8389 - [DanWylderNoble@gmail.com](mailto:DanWylderNoble@gmail.com)

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/66-investplan2-ws-VjdQNFwU19WNwdg.pdf>

Original File Name: ACP GGRF 2nd Investment Plan Cmmt Ltr - 11.13.15.pdf

Date and Time Comment Was Submitted: 2015-11-13 14:29:38

No Duplicates.



**Comment 62 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Beth

Last Name: Olhasso

Email Address: bolhasso@westcoastadvisors.com

Affiliation:

Subject: AECA Comments

Comment:

Please see the attached comments from AECA.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/67-investplan2-ws-WzpQMwZkU2FXDgVm.pdf>

Original File Name: AECA comments CapTrade Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-11-13 14:47:39

No Duplicates.

**Comment 63 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Graham  
Last Name: Noyes  
Email Address: gnoyes@kfwlaw.com  
Affiliation: Low Carbon Fuels Coalition

Subject: Comment of Low Carbon Fuels Coalition RE: INVEST2-WS  
Comment:

Attached please find the comments of the Low Carbon Fuels Coalition regarding the Draft Cap-and-Trade Auction Proceeds Second Investment Plan. Please let me know if there are any difficulties in opening the attachment or if there are any questions regarding the comment.

Thank you for your assistance.

Best Regards,

Graham

Graham Noyes  
Executive Director  
Low Carbon Fuels Coalition  
980 Ninth Street, 16th Floor  
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(916)668-4636 Direct  
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Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/68-investplan2-ws-Uz9WM1QzADBRCFAz.pdf>

Original File Name: LCFC Comment LTR and CCIFP GGRF 13 Nov 2015.pdf

Date and Time Comment Was Submitted: 2015-11-13 14:48:40

No Duplicates.

**Comment 64 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Alan

Last Name: Abbs

Email Address: alan@capcoa.org

Affiliation: CAPCOA

Subject: CAPCOA Comment Letter

Comment:

Thank you for the opportunity to comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/69-investplan2-ws-UTJUMwR1BDRROAlo.pdf>

Original File Name: CAPCOA Letter - Investment Plan Comment Letter 11.13.2015.pdf

Date and Time Comment Was Submitted: 2015-11-13 14:54:35

No Duplicates.

**Comment 65 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Ed

Last Name: Pike

Email Address: epike@energy-solution.com

Affiliation: Energy Solutions

Subject: Fuel Efficient Passenger Vehicle Tire Program, Draft Auction Revenue 2nd Investment Plan

Comment:

thank you for your consideration of our attached comment letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/70-investplan2-ws-AmcCaIE1UHEFZAB5.pdf>

Original File Name: Energy Solutions comments on Cap and Trade Auction Proceeds 2nd Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-11-13 14:48:22

No Duplicates.

**Comment 66 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Carolyn

Last Name: Ginno

Email Address: CGinno@sandiego.gov

Affiliation: City of San Diego Public Utilities

Subject: ARB Second Investment Plan Comment Letter

Comment:

Hello,

Please see the attached.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/71-investplan2-ws-BmAHaAZpVGYGbFAP.pdf>

Original File Name: FINAL VERSION - ARB 2nd Investment Plan comments Nov 2015 cp.pdf

Date and Time Comment Was Submitted: 2015-11-13 14:05:08

No Duplicates.

## **Comment 67 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Deborah

Last Name: Moore

Email Address: deborah@greenschools.net

Affiliation: Green Schools Initiative

Subject: Green Schools Initiative +24 org'n comments to include K-12 schools in Investment Plan

Comment:

Dear Ms. Nichols and Board members:

On behalf of the under-signed organizations and individuals, Green Schools Initiative welcomes the opportunity to submit comments on the Second Draft Cap-and Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19. Collectively, our organizations represent more than 1.6 million parents, students, facility directors, school board members, school district administrators, environmental educators, and health and environmental organizations, and nearly all 1,000 school districts and county offices of education in California. We advocate for K-12 public schools in California and are dedicated to ensuring that schools are community models of sustainability that contribute to achieving greenhouse gas reduction goals and that provide healthy, safe learning environments for all California students. Climate change is a children's issue: children are more vulnerable to heat-related illnesses, air pollution and asthma, and lack of access to safe outdoor spaces to play and learn. The California State PTA and the American Academy of Pediatrics both issued resolutions and policy statements this year recognizing children's special vulnerabilities to climate change and called for action.

Given that children are required to attend school, and that 1 in 5 Californians spend their day in a K-12 school - including 6.2 million school-aged children - we urge the California Air Resources Board to prioritize investments in greenhouse gas reduction projects at K-12 schools in its Investment Plan to protect children and capture significant emission reductions. Our recommendation is aligned with the "California Blueprint for Environmental Literacy," recently published by the California State Superintendent's Environmental Literacy Task Force and the Californians Dedicated to Education Foundation, which recommends that the California Air Resources Board explore possibilities for allocating a portion of the Greenhouse Gas Reduction Fund for developing green schools and schoolyards.

Healthy, sustainable, and green schools will contribute to each of the three over-arching priorities established in the draft Investment Plan for Transportation & Sustainable Communities, Clean Energy & Energy Efficiency, and Natural Resources & Waste Diversion. Alternatively, California will not achieve the goals of reducing greenhouse gas emissions by 40% below 1990 levels by 2030 if K-12 schools are not included given their sizable footprints. We

submitted similar comments on the first draft of the Investment Plan on September 1, 2015, but the second draft does not reflect these comments and we remain concerned about this significant gap in capturing substantial co-benefits from school-based projects for urban forestry, water conservation, active transportation, and waste reduction, among others. This letter builds on our earlier comments and provides additional recommendations for why and how to integrate schools into ARB's priority investments.

The word "schools" appears only once on page 32 of the second draft Investment Plan (in the first draft it was page 11 - same sentence) in a passing reference to active transportation. There is one existing program under ARB's Hybrid and Zero Emission Truck and Bus Voucher Incentive Project (HVIP) that includes grants for rural school districts to invest in lower-emission school buses, and should be continued. Proposition 39 provides funding for energy conservation and renewables at K-12 schools and is having a positive measurable impact on reducing schools' energy use. However, Prop 39 does not cover other greenhouse gas reduction projects like transit, composting, tree planting, asphalt removal, or water conservation. Currently, K-12 school districts are either excluded completely and are not eligible to apply for grants or the barriers to pursue greenhouse gas reduction funds are too high, requiring separate complex applications and reporting to different agencies, and managing separate partnerships in order to be eligible.

We urge ARB to include "Sustainable Schools" as an investment element relevant to investment concepts and "cross-cutting approaches" (pp. 28-29) in its Second Draft Three Year Investment Plan 2016-2019 and to ensure that K-12 public school districts - especially those in disadvantaged communities designated by CalEPA - are eligible to receive GGRF funds via existing or new grant programs. Sustainable, healthy schools are critical to achieving the State's greenhouse gas reduction goals and to protecting the health and well-being of vulnerable children from the impacts of climate change at school, while engaging students by modeling sustainability at school.

We recommend (attached letter has citations and footnotes):

1. Investments in Integrated Projects in Disadvantaged Communities for Local Climate Action (pp. 28-29) - We support priority investments for disadvantaged communities, as required by SB535, and recommend that K-12 schools in disadvantaged communities be included in your framework for "community greening" projects. There are an estimated 125,000 acres of school grounds (admittedly conservative estimate) and 36,000 school buildings that are perfect candidates for integrated approaches, including green infrastructure, tree planting, asphalt removal, cool/green roofs, active transportation, clean school buses, water conservation, water/energy nexus and more. School districts and Local Educational Agencies (LEAs) should be included in the "menu of potential projects" (p. 29) and should be included as potential recipients of grants, technical assistance, and other forms of support. To date, schools and LEAs "have been virtually left out of California's state policy framework on sustainable communities planning," including both SB375 and the Strategic Growth Council as well as AB32 - a glaring state disconnect considering that school facilities funding has been about 2/3 of all state general obligation bonds since the 1970s.

2. Include Schools as an Urgent Priority for Urban Forestry Grants (p. 43 and Figure 16): A recent study by UCLA estimated the average number of days with temperatures hotter than 95° F will increase from 58/year in 1980-2000 to 98/year in 2041-2060 in Riverside (~70% increase and even more when projected to 2100), 6/yr to 22/yr to 54/yr in Los Angeles, and 111/yr to 134/yr to 154/yr in Bakersfield, among other parts of southern California. Paved school grounds can be 20-40 degrees hotter than vegetated areas, worsening heat exposure. Investments at schools for urban forestry, asphalt removal and more permeable surfaces, cool roofs, and other green infrastructure projects can help reduce and mitigate these heat island effects, capture stormwater, sequester carbon in the soil, and save money, as well as create living schoolyards and outdoor classrooms that enhance children's learning. However, a study by Claremont Graduate University and Council for Watershed Health showed that 20% of the 509 elementary schools surveyed in Los Angeles Unified School District had 0% tree canopy and 100% paving – and that the schools with the fewest trees and most paving were primarily in low-income schools and communities. We know that children's health and ability to learn are worsened by heat extremes. Yet, K-12 schools are not eligible for CalFire urban forestry grants; in some regions (but not all) non-profits may apply with schools as a partner but schools, districts, and LEAs cannot apply directly. Given the greater impact of heat on children and the disparity in tree cover at schools in disadvantaged communities, ARB should ensure that K-12 schools in disadvantaged communities are eligible to apply directly for urban forestry grants, together with other integrated "school greening" projects with multiple co-benefits. In Figure 16 (p. 45), school districts and LEAs should be included as potential recipients.

3. Include Schools in Reducing Short-lived Climate Pollutants (p. 44 and Figure 16) – We support the Investment Plan's priority to reduce short-lived climate pollutants, such as methane, via waste reduction and composting; however, we urge you to ensure that K-12 schools are eligible for funding via CalRecycle. The state will not be able to meet its 75% diversion goal by 2020 if K-12 schools are not participating, given that school districts are often the largest single generator of waste in many communities – upwards of 5% of municipal waste – and generate more than 764,000 tons per year. AB1826 requires commercial-scale composting, including schools. In April 2016, the law requires that schools that generate more than 8 cubic yards of organic waste per week must arrange for composting (and regulations tighten the targets in subsequent years to achieve 75% diversion by 2020). Yet, current and proposed grant programs for waste reduction and composting of organics through CalRecycle exclude K-12 schools. Investing in recycling and composting at K-12 schools is leveraged because children bring these habits home and teach and motivate their parents and community members to do so, as well. Schools cannot comply with AB1826 and AB32 diversion requirements if they cannot access funding; and community diversion requirements cannot be met unless school districts participate. The "Waste as a Resource" section on p. 44 should include source reduction strategies, in addition to the resource recovery infrastructure strategies and not only anaerobic digestion projects. Figure 16 "Reduce Methane Release from Organic Waste" should include a bullet point under "Organic Waste" to "Support infrastructure needed for source reduction and organics recycling/composting" and should also include school districts and LEAs in the list of "Potential Recipients."

4. Include Schools in Low-Carbon Water System and Water



Conservation (p. 34-36 and Figure 14) – Schools have a lot of acreage and grass and can be large water-users. If schools and LEAs are not participating in water conservation efforts, it will be difficult to achieve the target to lower urban water usage 20% below 2005 levels by 2020 (Figure 13, p. 35). Improving water conservation and increasing permeable surfaces on school grounds can contribute to recharging groundwater, reducing stormwater runoff, and saving water and energy through decreased water demand. The State Water Board's Drought Response Outreach Program for Schools (DROPS) was highly successful and over-subscribed. The DROPS program should be renewed, perhaps via GGRF allocations; it was previously funded via Propositions 13, 40, and 50; there are not plans currently to renew the DROPS program. Figure 14 (p. 39) should include under "Low Carbon Water System" a bullet point: "Support urban water conservation and increased stormwater capture" and include school districts and LEAs in the list of "Potential Recipients."

5. Include Schools in Transportation and Sustainable Communities (pp. 32-34 and Figure 12) – From Safe Routes to School: "Within the span of one generation, the percentage of children walking or bicycling to school has dropped precipitously, from approximately 50% in 1969 to just 13% in 2009. In 2009, American families drove 30 billion miles and made 6.5 billion vehicle trips to take their children to and from schools, representing 10-14 percent of traffic on the road during the morning commute. Returning to 1969 levels of walking and bicycling to school would save 3.2 billion vehicle miles, 1.5 million tons of carbon dioxide and 89,000 tons of other pollutants—equal to keeping more than 250,000 cars off the road for a year." Given the heavy traffic moving children to school each day, we recommend that greater priority be made for clean school buses under "Advanced Vehicle Technology" in Figure 12 (p. 33) and that school districts and LEAs be included as "Potential Recipients." Also, we recommend that "sustainable school strategies" and "transit-oriented schools" be included under "Sustainable Communities and Transportation Infrastructure" in Figure 12 and that school districts and LEAs be included as "Potential Recipients."

6. Include Schools in Sustainable Communities, "Neighborhood Scale," Community Centers, and other frameworks for integrated approaches to implementing climate action plans – Many public comments on the Investment Plan have recommended including strategies and mechanisms to reduce the barriers for integrated and comprehensive projects. This is particularly relevant for K-12 schools, where integrated projects with maximum benefits could include active transportation, cool roofs, water/energy nexus, green infrastructure, waste reduction, tree planting, and asphalt removal/permeable surfaces. However, needing to apply to multiple agencies for separate grants creates silos and tremendous barriers that limit these projects. Furthermore, K-12 school districts and LEAs are not considered eligible to apply to many of the existing grant programs funded via AB32. We recommend that ARB develop coordinated mechanisms to streamline applications for integrated projects and include K-12 school districts as eligible applicants. This could include establishment of a "Healthy & Sustainable Schools" integrated grant program for school-based climate action projects that would align with the California Department of Education's existing Green Ribbon Schools award and recognition program (<http://www.cde.ca.gov/ls/fa/sf/greenribbonprog.asp>). This recognition program application includes metrics for energy and water use, waste generation and diversion, carbon footprint,

outdoor landscaping and other relevant items. California Green Ribbon School awardees are exemplary models of integrated sustainability programs and are diverting upwards of 50% of their waste, reducing their carbon footprints 10-30%, promoting transit and Safe Routes to Schools, creating green schoolyards and green infrastructure, saving water and energy, and engaging students in hands-on sustainability education and behaviors that ripple throughout the community. Our September 1, 2015 letter provided specific examples of the tangible and multiple benefits that sustainable, green schools are generating, such as the 2015 Green Ribbon awardees, several of which are schools serving disadvantaged communities. California has 1,000 school districts and 10,300 public schools with huge potential to save millions of tons of greenhouse gases per year.

Other options for streamlining the application process for integrated projects could include establishing an inter-agency coordination mechanism and ensuring that K-12 school districts are eligible. We also support efficient and innovative financing mechanisms, including revolving loan funds and state green development banks, to extend the utility of GGRF proceeds, as outlined in the Investment Plan (p. 29).

The 25 organizations and individuals signing this letter, representing nearly all 1,000 school districts in California, support reducing the carbon footprint and improving the sustainability of K-12 school buildings, grounds, and operations; promoting healthy, resilient communities; and teaching environmental and outdoor education and climate literacy. We believe that sustainable schools and environmental literacy are fundamental to California's health, prosperity, and security. Investing in greenhouse gas reduction projects at schools will help solve the growing climate problems we face now, while also preparing our children to be the environmental leaders and engaged community members of tomorrow. Thank you for your consideration of our comments to include schools as part of California's solution for mitigating climate change.

Sincerely,

Deborah Moore, Executive Director  
Green Schools Initiative  
Berkeley, CA  
deborah@greenschools.net

On behalf of:

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Shayne Silva  
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Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/72-investplan2-ws-VzBQMVwvUGUEXQg6.pdf>

Original File Name: GGRF 2nd Draft Investment Plan Ltr Sustainable Schools 11-13-15 (Final).pdf

Date and Time Comment Was Submitted: 2015-11-13 14:56:47

No Duplicates.

## **Comment 68 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Kerri

Last Name: Timmer

Email Address: dmadson@sierrabusiness.org

Affiliation: Sierra Business Council

Subject: Sierra Business Council Comment on Draft C&T Auction Proceeds Second Investment Plan

Comment:

November 13, 2015

Chairwoman Mary Nichols  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

RE: Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Dear Chairwoman Nichols, Board Members, and Staff:

Sierra Business Council (SBC) - a non-profit network of more than 4,000 business, local government and community partners working to foster vibrant, livable communities in the Sierra Nevada - is pleased to provide comments on the Draft Cap-and-Trade Auction Proceeds Second Investment Plan.

We appreciate the Draft's inclusion of the following:

1) Focus on increased rural participation, especially in the forestry, waste diversion and sustainable communities sectors, including the proposal for a dedicated funding stream for rural areas in the Affordable Housing Sustainable Communities (AHSC) program. Investments in rural resource areas recognizes the contributions made by such areas to the rest of the state and helps to address the Governor's goals, such as increasing investment in land stewardship, building resilience in our natural systems, appropriately valuing the services provided by our ecosystems, and increasing the use of biomass as a local, alternative energy sources.

2) Emphasis on forest management, both as a complement to protection from conversion to more carbon-intensive uses and a means of reducing wildfire emissions, increasing carbon storage, and achieving additional co-benefits, such as: reducing other harmful pollutants, improving public health, providing jobs that support local economic development, and improving the sustainability of our energy and water systems for all users.

3) Recognition of the need to start now to reduce risks to the landscape, decrease emissions and increase carbon storage to meet medium- and longer-term greenhouse gas (GHG) reduction goals. While forest restoration, waste diversion and fire risk reduction

activities may temporarily increase emissions, those activities are necessary to set the stage for long-term carbon storage and emission reductions beyond 2020.

4) Offering the ability to use Greenhouse Gas Reduction Fund (GGRF) funds on federal lands.

5) Additional outreach and technical assistance to disadvantaged communities, including rural disadvantaged areas.

6) Urban greening to increase carbon storage and moderate heat effects in the built environment.

7) Use of conservation easements on working lands (agricultural and forest) to protect existing carbon and reduce conversion to higher-emitting uses.

We offer the following suggestions for the Draft Cap-and-Trade Auction Proceeds Second Investment Plan:

1) Increase the Affordable Housing Sustainable Communities' (AHSC) rural program from 10% to 20% to bring it in line with the TCAC program upon which the definition of "rural" is modeled, and in recognition of the tremendous need for protection and management of our natural resources - particularly in the headwaters of the state's primary water system.

2) At a minimum, double Greenhouse Gas Reduction Fund (GGRF) investment in the Natural and Working Lands sector, including a concomitant increase in the non-urban forestry portion of that sector, in recognition of the priority the Governor and his Administration have placed on forest carbon capture and sequestration, reduction of forest-related short-lived climate pollutants, and organic waste diversion to create bioenergy and other products.

3) Use GGRF funds to establish landscape-level demonstrations where individual projects within the demonstration footprint are designed to begin developing a regionwide GHG/carbon inventory, set of baseline assumptions, GHG/carbon quantification methodologies, and a common approach to GHG/carbon accounting that considers project-specific co-benefits, lifecycle accounting, and integrated benefits across sectors (e.g. waste diversion, renewable energy, SCS, transportation, climate action plans).

4) Find a different tool or overlay additional criteria for identifying disadvantaged communities in rural areas of the state. While we understand the obvious need to focus resources on the state's most disadvantaged communities, we continue to be concerned about the use of Cal EnviroScreen as the sole mechanism for identifying those communities. The EnviroScreen criteria focus primarily on urban metropolitan areas due to the emphasis on pollutants or other criteria that either are not measured in or do not affect rural communities, especially those located in the Sierra. Yet many of our communities are disadvantaged based on below-average household incomes and health impacts from water contamination and air pollution from wildfire and other "non-urban" sources.

Specifically, we suggest incorporating the criteria defining

Economically Distressed Areas as defined in the 2014 water bond (Prop. 1), which includes "a municipality with a population of 20,000 persons or less, a rural county, or a reasonably isolated and divisible segment of a larger municipality where the segment of the population is 20,000 persons or less, with an annual median household income that is less than 85 percent of the statewide median household income, and with one or more of the following conditions as determined by the department [Department of Water Resources]: (1) Financial hardship, (2) Unemployment rate at least 2% higher than the statewide average, (3) Low population density."

5) Identify supplementary delivery mechanism for GGRF funding in addition to Metropolitan Planning Organizations (MPOs). We support the Sustainable Communities Strategy efforts, but the rural areas of the state largely lack MPOs, or if they do have them, they are typically county-wide and do not focus on the rural portions of the county where GHG reduction gains can be made by employing similar compact growth, transportation-related and natural and working lands improvements in rural areas. In fact, studies such as the 2015 Boston University "Cities, traffic, and CO2: A multidecadal assessment of trends, drivers, and scaling relationships" [Conor K. Gately, Lucy R. Hutyra, and Ian Sue Wing], indicate that rural investment in transportation yields even more benefit than urban given the long distances rural residents typically travel to access basic services and destinations.

We recommend development of a companion rural mechanism to achieve vehicle miles traveled (VMT) reduction goals and co-benefits in rural communities. More than 4 million people live in rural areas of the state that are not covered by MPOs and, therefore, are not required to develop Sustainable Communities Strategies for transportation and housing. This investment plan needs to create better options for more transportation-efficient rural communities across the state, including those not located within MPO areas.

SBC appreciates the Air Resources Board's recognition, in advance, of many of these issues, as presented at the workshops earlier this month. We would like to work with you, especially related to addressing rural issues, and look forward to participating in the continuing discussion about how to ensure the second Cap-and-Trade Auction Proceeds Investment Plan is meaningful to all Californians and achieves the state's post- 2020 climate goals.

All best,

Kerri Timmer  
Government Affairs Director

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/73-investplan2-ws-UiFWMgdlWVUFYARr.pdf>

Original File Name: SBC Comment on CARB Draft Second Investment Plan\_2015\_11\_13.pdf

Date and Time Comment Was Submitted: 2015-11-13 14:59:32

No Duplicates.



**Comment 69 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Jennifer

Last Name: Byous

Email Address: jbyous@placer.ca.gov

Affiliation: Placer County

Subject: Comments on Draft Cap-and Trade Auction Proceeds Second Investment Plan

Comment:

See attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/74-investplan2-ws-V2UHbwNmVlpVOIM9.pdf>

Original File Name: 2nd\_investment\_comments.pdf

Date and Time Comment Was Submitted: 2015-11-13 14:21:52

No Duplicates.

## **Comment 70 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Katie

Last Name: Valenzuela Garcia

Email Address: kgarcia@sacbreathe.org

Affiliation: Breathe California

Subject: Cap and Trade Auction Proceeds Triennial Investment Plan for 2016-2019

Comment:

Dear Chairman Mary D. Nichols and Executive Officer Richard Corey,

Thank you for the hard work that Air Resources Board (ARB) staff has done to make the Auction Proceeds Triennial Investment Plan for 2016-2019 possible. We are writing as a coalition of groups serving the Sacramento Region to recommend changes to the 2016-19 draft Investment Plan. As a region, we have formed a coalition of public agencies and organizations working together to support and advance applications for key Greenhouse Gas Reduction Fund grants, and have complimented that effort with a robust public engagement process in "disadvantaged communities." Our comments are directly informed by those efforts.

We appreciate that the current draft plan includes strategies for generating green jobs, making businesses and multi-family housing developments eligible for energy improvements, investments in natural and working lands, and promoting community solar and alternative transportation. These strategies will go a long way in helping California achieve our climate goals, and directly reflect the priorities of stakeholders in our region.

We also continue to affirm following principles:

- Center proposed efforts around "disadvantaged communities," or those most impacted
- Advance a systems approach to maximize greenhouse gas reductions as well as co-benefits
- Increase coordination among agencies in investment decisions to allow for collective decision-making and effective programming

We have identified several additional strategies that we think will further the goals of the plan while also achieving significant co-benefits for residents of our state's "disadvantaged communities":

- Ensure that community centers are eligible for all programs, particularly regarding electric vehicle charging stations. "Community Centers" should include school sites (operational and non-operational), churches, and any large space used for community-benefit purposes. These gathering places for the community are centrally located within "disadvantaged communities." Investments at those sites would greatly advance California's climate goals.
- Include urban agriculture as a strategy for both carbon sequestration and greenhouse gas emission reduction. And dedicate a greater percentage of auction proceeds to urban and rural farms that enhance soil health. In addition to the significant benefits

to the environment, urban agriculture can facilitate community compost programs that reduce food waste, increase urban greenspace, reduce the need to drive long distances to grocery stores or markets, and create meaningful economic development opportunities for residents of "disadvantaged communities."

- Expand and clarify language in the current plan to ensure inclusion of successful agricultural climate strategies. Improving the health of agricultural soils with the use of compost, cover cropping, crop rotations, conservation tillage, and other improved farming practices can increase the carbon storage capacity of soils and reduce overall GHG emissions while reducing air and water and synthetic fertilizer use

- Create a new goal to layer as programs as much as possible. Any new improvement or development funded by the Greenhouse Gas Reduction Fund should be able to take advantage of other funded programs and services to ensure maximum impact. This may require more cohesion in the application process, or allowing funded programs under Urban Forestry, Transit, Energy Efficiency and Weatherization, and Affordable Housing and Sustainable Communities to directly collaborate to ensure the creation of effective referral processes.

Finally, we would respectfully ask ARB and administering agencies to allow at least three weeks of review for new policy documents before closing public comment or holding public meetings. While we understand the production of these documents is a monumental task, a longer timeframe for public review would better facilitate the full and meaningful participation of residents and groups located within "disadvantaged communities" as required by Assembly Bill 32.

Thank you for your time and consideration of these comments.

Sincerely,

Brenda Ruiz  
Slow Food California

Brenda Ruiz  
Slow Food Sacramento

Christal Waters, Resident  
City of Davis

Jonathan Ronald Tran, Organizer  
Hmong Innovating Politics

Marti Brown, Executive Director  
North Franklin Business District Association

Marti Brown, Executive Director  
North Franklin Community Development Fund

Matt Read, Director of Government Relations  
Breathe California

Michael Blair, President  
South Oak Park Community Association

Michelle Pariset, Organizer  
Capital Region Organizing Project

Paul Towers, Organizing & Media Director  
Pesticide Action Network

Rachel Rios, Executive Director  
La Familia Counseling Center

Ray Tretheway, Executive Director  
Sacramento Tree Foundation

Richard Guerrero, President  
Environmental Council of Sacramento

Richard A. (Tony) VanCuren, Professional Researcher  
UC Davis Air Quality Research Center

Rick Bettis, Natural Resources Director  
League of Women Voters Sacramento County

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/75-investplan2-ws-UzIBdVAzVFgFagdp.pdf>

Original File Name: ARB InvestPlan 11.13.15\_FINAL.pdf

Date and Time Comment Was Submitted: 2015-11-13 15:17:43

No Duplicates.

**Comment 71 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Paul

Last Name: Mason

Email Address: pmason@pacificforest.org

Affiliation:

Subject: PFT Comments on Draft Investment Plan

Comment:

Please see attached PDF.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/77-investplan2-ws-VWQHMFxzVjQANQMt.pdf>

Original File Name: 11.13.15 PFT Inv Plan comment ltr.pdf

Date and Time Comment Was Submitted: 2015-11-13 15:19:27

No Duplicates.

**Comment 72 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Meghan

Last Name: Harwood

Email Address: meghan@natelenergy.com

Affiliation:

Subject: Comment Submission by Natel Energy, Cap-And-Trade Auction Proceeds Second Investment Plan

Comment:

Comments submitted on behalf of Natel Energy, Inc.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/78-investplan2-ws-AWIAZ1c6WGIHZwBv.pdf>

Original File Name: California ARB Cap-and-Trade Auction Second Investment Plan-Comments by Natel Energy.pdf

Date and Time Comment Was Submitted: 2015-11-13 15:20:43

No Duplicates.

**Comment 73 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Larry

Last Name: Greene

Email Address: lgreene@airquality.org

Affiliation: SMAQMD

Subject: 2nd Investment Plan

Comment:

Please find attached our comment letter on the 2nd investment Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/79-investplan2-ws-V2UGbgdiBQIQP1I8.pdf>

Original File Name: 2nd Investment Plan Comment Letter.pdf

Date and Time Comment Was Submitted: 2015-11-13 15:18:14

No Duplicates.

**Comment 74 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Doug

Last Name: Houston

Email Address: laura@houstonmagnani.com

Affiliation: Multiple Organizations

Subject: Commenta

Comment:

Please respectfully accept the attached comments on the Draft Cap and Trade Auction Proceeds Second Investment Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/81-investplan2-ws-UWAGNVwCV2UBdVc1.pdf>

Original File Name: 15 ARB Draft Comments revised November 13th.pdf

Date and Time Comment Was Submitted: 2015-11-13 15:26:11

No Duplicates.



**Comment 75 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Jessica

Last Name: Goodheart

Email Address: jgoodheart@laane.org

Affiliation: LAANE

Subject: LAANE Comments on Draft Cap-and-Trade Auction Proceeds Second Investment Plan  
Comment:

Attached please find LAANE's comments on the Investment Plan

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/82-investplan2-ws-BzYCMQExVzVXYAIx.pdf>

Original File Name: 151113 LAANE Letter to Mary Nichols re Draft Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-11-13 15:41:41

No Duplicates.

**Comment 76 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Jeanie

Last Name: Ward-Waller

Email Address: jeanie@calbike.org

Affiliation: California Bicycle Coalition

Subject: Coalition for Active Transportation Leaders comments

Comment:

Please consider the comments on the Draft Second Investment Plan in the attached letter. I would be happy to answer any questions.  
Thanks!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/84-investplan2-ws-VTRVJ1w+ADwHbANu.pdf>

Original File Name: ATcommentsonCTdraft2ndinvestmentplan.pdf

Date and Time Comment Was Submitted: 2015-11-13 15:48:35

No Duplicates.

**Comment 77 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Jean-Pierre

Last Name: Cativiela

Email Address: dairycares@aol.com

Affiliation: Dairy Cares coalition

Subject: Dairy Cares comments on 2nd Investment Plan

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/85-investplan2-ws-UjYGYQFpUnMFellx.pdf>

Original File Name: DairyCares.11.13.2015.pdf

Date and Time Comment Was Submitted: 2015-11-13 15:49:22

No Duplicates.

**Comment 78 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Deborah  
Last Name: Bloome  
Email Address: dbloome@treepeople.org  
Affiliation: TreePeople

Subject: TreePeople Comments on Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Comment:

Greetings,

TreePeople respectfully submits our comments on the Second Investment Plan, and we appreciate the opportunity to do so.

Sincerely,

Deborah Weinstein Bloome  
Senior Director of Policy  
TreePeople

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/86-investplan2-ws-WzwAYVYlAzYEXQl6.pdf>

Original File Name: GGRF Second Investment Plan comments 11.13.15.pdf

Date and Time Comment Was Submitted: 2015-11-13 15:50:31

No Duplicates.

## **Comment 79 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Evan

Last Name: Edgar

Email Address: [evan@edgarinc.org](mailto:evan@edgarinc.org)

Affiliation: Ca Compost Coalition

Subject: AB 32-Cost Effectiveness with compost and anaerobic digestion

Comment:

CCC has been submitting these same comments for over one-year where cost-effectiveness of AB 32 programs should receive greater consideration for investments.

The LOA recommended that the Governor may want to increase or decrease funding for specific programs in the future that will maximize GHG emission reductions. We look forward to CARB's leadership on determining GHG reduction metrics by commissioning an update to the 2008 Study titled "A Cost-effectiveness Analysis of AB 32" authored by Stanford University.

It would be timely for California Air Resources Board adopt, update, and amend a cost-effectiveness study of AB 32 like the one presented by Stanford University. Data from such a study will show that investments in emerging organics waste management technologies for the production of renewable natural gas and compost will make significant and efficient progress towards accomplishing AB 32's mandate.

The CCC has encouraged CalRecycle to take advantage of the flow of information from the Organics Grant Program to analyze the aggregate data received to provide an assessment of the metrics associated with greenhouse gas reductions from organics management approaches. The Cap-and-Trade program raised \$850 million for the 2014-2015 Budget with \$30 million allocated to recycling and composting, \$200 million to low carbon transportation, and \$20 million to improving agricultural efficiency. The allocation was based upon the investment priorities set by the Governor and his Climate Action Team which promoted three key sectors that reduce greenhouse gases: Sustainable Communities & Clean Transportation, Energy Efficiency & Clean Energy, and Natural Resources & Waste Diversion.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/87-investplan2-ws-UTwAZwFyVmlGaQln.pdf>

Original File Name: Marginal Abatement Costs Draft.pdf

Date and Time Comment Was Submitted: 2015-11-13 15:50:33

No Duplicates.

**Comment 80 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Nina

Last Name: Babiarz

Email Address: babiarz@cox.net

Affiliation: SCRTTC

Subject: SCRTTC Input-Second Investment Plan and Draft Funding Guidelines

Comment:

SCRTTC Follow-on written input from the ARB Second Investment Plan workshop recently held November 5th in Los Angeles and hosted at Caltrans headquarters.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/88-investplan2-ws-VSYAZVQnWH9QIgBj.pdf>

Original File Name: SCRTTC ARB Nov 5th LA Wkshop - 2nd Investment Plan Input.pdf

Date and Time Comment Was Submitted: 2015-11-13 15:56:26

No Duplicates.

## **Comment 81 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Sean

Last Name: Edgar

Email Address: sean@cleanfleets.net

Affiliation: CleanFleets.Net and Compost Coalition

Subject: Class 7 and 8 diesel fleet to RNG with GGRF funding needed

Comment:

Jointly, CleanFleets.net & the California Compost Coalition (CCC) advise hundreds of heavy duty diesel truck fleet owners in the transportation and processing of organic materials (includes greenwaste, food waste, wood chips and municipal solid waste). We are disappointed that natural gas vehicles have been excluded from consideration in the GGRF clean truck funding plans given that the new CNG engines are extremely low and NOx and the RNG fuel has the lowest CIs. We have shared the following concerns with the CARB Board and staff since December 2014 and have asked for financial incentives in a systems approach that converts a fleet from diesel to CNG by converting food waste to RNG fuel for that fleet:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/89-investplan2-ws-B25cNFQjVWNVIAVx.pdf>

Original File Name: Investment Plan comments.pdf

Date and Time Comment Was Submitted: 2015-11-13 16:09:28

No Duplicates.



## **Comment 82 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Brad

Last Name: Heavner

Email Address: brad@calseia.org

Affiliation: California Solar Energy Industries Assoc

Subject: Investments Needed to Compete with Low Natural Gas Prices

Comment:

The draft "Cap-and-Trade Allowance Proceeds Second Investment Plan" (Investment Plan) rightly acknowledges that, "Reducing energy-sector emissions to near-zero by 2050 will require wholesale changes to the State's current electricity and natural gas systems." The Plan highlights the need for targeted investments to achieve that goal, including investments to develop biomass energy sources, to reduce green waste burning, to develop carbon capture and storage technology, and to convert to preferred refrigerant systems. With respect to refrigerants, the Plan states that although alternative technology exists in the marketplace, "financial barriers inhibit widespread adoption."

This is precisely the type of problem that the Cap-and-Trade Program is well suited to address, and it is necessary also to apply the reasoning to technologies that compete with natural gas. Shale gas drilling has dramatically reduced the price of natural gas in California and the U.S. Technologies that are effective at reducing greenhouse gas emissions from natural gas combustion may not be cost effective from a customer adoption standpoint even if they are cost effective from a statewide carbon reduction standpoint.

Solar water heating is a prime example. Heating water in homes and businesses accounts for 3.5%-4% of total statewide greenhouse gas emissions. Solar technologies are effective at reducing emissions from residential, commercial and industrial water heating. However, the return on a customer-driven investment has not been sufficient to lead to adoption anywhere near the technical potential or the level needed to substantially address this sector of emissions.

The Investment Plan should specifically address this as a problem and an opportunity. Technologies that reduce the carbon intensity of non-utility activities where heat is typically supplied by the combustion of natural gas may be hindered by the low price of natural gas. Providing support for those technologies may be an effective investment in greenhouse gas reduction.

A recent decision at the California Public Utilities Commission failed to capitalize on the opportunity of allowance revenue from natural gas utilities as a meaningful price signal or funding source. The decision ordered that utilities only consign to auction the minimum percentages in the Cap-and-Trade Regulation - 30% in 2016, increasing 5% per year - and that utilities return all of the proceeds to customers as bill credits.

The CPUC decision thwarts the entire objective of the Cap-and-Trade Program. The carbon price signal is estimated to be \$11.97 to \$14.89 per year. At that level, it will do nothing to reduce greenhouse gas emissions. The CPUC is effectively delaying any action on addressing climate change through natural gas utilities and the Cap-and-Trade Program until years from now when carbon pricing has risen to a meaningful level. This is time that we do not have to spare.

In implementing the Cap-and-Trade Program, ARB is careful not to interfere with the decision making processes of other state agencies. However, other agencies do not have the same mandate to reduce greenhouse gas emissions and give the issue much less attention. ARB gave final say on the consignment percentage to CPUC, but then the CPUC deferred to the previous guidance from ARB.

The Board must also be willing to fund programs that were previously created by other agencies. The Cap-and-Trade Program has a prohibition on funding programs that are already funded by other sources. This is an important protection to make sure that Cap-and-Trade funds are not used in a "shell game," in which previous or ongoing allocations to an emission reduction program are diverted elsewhere. However, this should not be applied to programs that have received a specified amount of funding that is determined to be insufficient to address the need. As long as that previous allocation is not removed and is unlikely to be renewed, supplementing it with funding from allowance revenues can be appropriate. The goal is emission reduction, and if an investment is able to genuinely achieve that goal it should not be taken off the table.

Thank you for the opportunity to comment. We look forward to working with the Board to help develop policies that lead to a low carbon future and a strong economy.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/90-investplan2-ws-UzACZQBtVHQDYAFo.pdf>

Original File Name: CALSEIA Comments on Investment Plan 11-13-15.pdf

Date and Time Comment Was Submitted: 2015-11-13 16:10:20

No Duplicates.

**Comment 83 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Cristina

Last Name: Gagnon

Email Address: cgagnon@cityofdavis.org

Affiliation: Administrative Aide

Subject: Comments on Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Comment:

Please see the attached letter for your consideration.

Kind Regards,  
Cristina

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/91-investplan2-ws-Wz9WIgRkADUFdwJd.pdf>

Original File Name: Draft Cap-and-Trade.pdf

Date and Time Comment Was Submitted: 2015-11-13 15:54:16

No Duplicates.

**Comment 84 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Fabiola

Last Name: Lao

Email Address: fabi@ccair.org

Affiliation: SB 535 Coalition

Subject: RE: Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Comment:

Comment letter has been attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/92-investplan2-ws-USIAZFQKA2UBNFBI.pdf>

Original File Name: SB 535 Coalition 2nd Investment Plan Letter \_11-13-15.pdf

Date and Time Comment Was Submitted: 2015-11-13 16:13:47

No Duplicates.

**Comment 85 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Gabriella  
Last Name: Roff  
Email Address: groff@calt trout.org  
Affiliation: California Trout

Subject: Comments from California Trout  
Comment:

Dear Sir/Madam,

Attached please find a letter outlining California Trout's comments on the Draft Cap-and-Trade Auction Proceeds Second Investment Plan.

Sincerely,

Gabriella Roff  
Director of Institutional Giving

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/93-investplan2-ws-UjFROFI+WGYZwZo.pdf>

Original File Name: comment letter 11-13-15.pdf

Date and Time Comment Was Submitted: 2015-11-13 16:19:40

No Duplicates.

## **Comment 86 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Carolyn

Last Name: Casavan

Email Address: carolyn@casavanconsulting.com

Affiliation:

Subject: Dedicated Allocation for Sepulveda Pass Solution

Comment:

I am requesting that a dedicated allocation of Cap and Trade funds be assigned to the Sepulveda Pass project beginning in the second or third year of the 2nd Investment Plan, contingent on the passage of local funding, that this funding would be separate from the general pool of transit funds already provided in the plan, and that this allocation be committed for a period of years to enable the building of this project within the next decade.

LA Metro has noted that "the I-405 corridor serves a captive market of commute trips from the San Fernando Valley to Westside employment areas that cannot be served by other freeway alternatives." Metro Sepulveda Pass Corridor Planning Study, 2012.

This freeway also serves as a major connector between the San Fernando Valley and Northern Los Angeles County to the Los Angeles International Airport and the seaports to the south.

This has been one of the most heavily congested routes in the nation. The congestion is so bad that it spills over onto adjacent streets and highways. Recent road improvements have alleviated congestion somewhat but how long this will last is yet to be seen. Per the Caltrans 2013 Traffic Volumes on California State Highways, there are an average of 287,000 daily trips through the Sepulveda Pass on the 405.

We need a public transit solution through this pass. The only alternative for this is a subway, a very expensive project. LA Metro estimates the cost of this project at over \$6 billion. Their current draft proposed funding for the project as part of Measure R2 will fall short of the total revenues needed. They have acknowledged that the project will need an infusion of State and Federal funds.

The justifications for making such a commitment are that a subway under the pass would:

- Reduce traffic through the pass reducing GHG emissions.
- Reduce commute costs and times for residents of moderate and low-income communities who live in the San Fernando Valley and work in the Westside.
- Reduce GHG and criteria emissions related to standing traffic along the 405 and the canyon routes in this area.
- Provide public transit access to the Los Angeles International Airport from the San Fernando Valley and northern Los Angeles County.
- Enable and encourage the development of sustainable communities along the route in the San Fernando Valley and the Westside.

Thank you for your consideration,  
Carolyn Casavan

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-11-13 16:27:49

No Duplicates.

**Comment 87 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Kimberley  
Last Name: Delfino  
Email Address: kdelfino@defenders.org  
Affiliation:

Subject: Defenders of Wildlife Comments  
Comment:

Please find comments from Defenders of Wildlife on the Draft Second Investment Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/95-investplan2-ws-BWFCNQB2WFQCYA17.pdf>

Original File Name: DOW Draft Second Investment Plan Comments.pdf

Date and Time Comment Was Submitted: 2015-11-13 16:32:00

No Duplicates.



**Comment 88 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Christina

Last Name: Lokke

Email Address: ChristinaL@csda.net

Affiliation: CSDA

Subject: Comments on Investment Plan Draft

Comment:

Please see the attached comment letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/96-investplan2-ws-BmUHclYzUGILUgJh.pdf>

Original File Name: CSDA Cap-and-Trade Auction Proceeds Second Investment Plan Comment Letter 11.13.2015.pdf

Date and Time Comment Was Submitted: 2015-11-13 16:32:37

No Duplicates.

**Comment 89 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Kelsey

Last Name: Jessup

Email Address: [kjessup@luskin.ucla.edu](mailto:kjessup@luskin.ucla.edu)

Affiliation: UCLA Luskin Center for Innovation

Subject: Comments from UCLA Luskin Center for Innovation

Comment:

Please see attached for the comment letter from the director of our Center.

Much appreciated,  
Kelsey Jessup

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/97-investplan2-ws-UCVXMIM+WWsCWwNv.pdf>

Original File Name: UCLA Luskin Center\_Written Comments on Draft Second Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-11-13 16:33:36

No Duplicates.

**Comment 90 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Kaylon

Last Name: Hammond

Email Address: khammond@leadershipcounsel.org

Affiliation:

Subject: Comments on Second Investment Plan

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/98-investplan2-ws-UWMCa104WFQCbQVr.pdf>

Original File Name: 2nd Investment Plan Comment Letter.pdf

Date and Time Comment Was Submitted: 2015-11-13 16:13:52

No Duplicates.

**Comment 91 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: George

Last Name: Lange

Email Address: glange@crpd.org

Affiliation: Mountains Recreation and Conservation Au

Subject: Comments on the Draft Cap-and-Trade Auction Proceeds Second Investment Plan  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/99-investplan2-ws-AWxTJ1Q2UGIGXwRn.pdf>

Original File Name: MRCA Comments on Draft Cap-and-Trade Auction Proceeds Nov 13.pdf

Date and Time Comment Was Submitted: 2015-11-13 16:31:00

No Duplicates.

**Comment 92 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Charles

Last Name: Watson

Email Address: cwatson@calstrat.com

Affiliation:

Subject: Draft 3-Year Cap-and-Trade Investment Plan Comment Letter

Comment:

Letter attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/100-investplan2-ws-WzgBZlAjV2YLUgZl.docx>

Original File Name: CARB CCIP Comments\_WaterSmart.docx

Date and Time Comment Was Submitted: 2015-11-13 16:10:04

No Duplicates.

## **Comment 93 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Jenny

Last Name: Woods

Email Address: jwoods@lgc.org

Affiliation: Capital Region Climate Readiness Collab.

Subject: Comment Letter from the Capital Region Climate Readiness Collaborative

Comment:

Please find, attached, a letter from the Capital Region Climate Readiness Collaborative. The CRC is a collaborative network designed to promote greater resilience through coordination at the regional and local level across the six-county Capital Region (El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba counties).

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/101-investplan2-ws-VjVVIQZkVlpVPwls.pdf>

Original File Name: CRC Letter\_2nd Draft Investment Plan\_Final.pdf

Date and Time Comment Was Submitted: 2015-11-13 16:46:12

No Duplicates.

**Comment 94 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Francesca

Last Name: Wahl

Email Address: fwahl@solarcity.com

Affiliation:

Subject: Second Triennial C&T Investment Plan - Coalition Letter

Comment:

Please find attached the letter that was submitted today on behalf of a coalition of stakeholders in response to the draft second triennial cap and trade investment plan focused on a credit enhancement program.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/102-investplan2-ws-AnFTMAFjWGQBaqZi.pdf>

Original File Name: Second Triennial C\_T Investment Plan Coalition Letter Nov 2015 FINAL.pdf

Date and Time Comment Was Submitted: 2015-11-13 16:36:38

No Duplicates.

**Comment 95 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Chuck

Last Name: Mills

Email Address: cmills@californiareleaf.org

Affiliation: California ReLeaf

Subject: Written Comments Regarding Urban Forestry and the Next Three Year Investment Plan  
Comment:

On behalf of California ReLeaf and the California Urban Forests Council, we thank CARB for the opportunity to provide written comments on the Next Three Year Investment Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/103-investplan2-ws-AWJSNVckWGkEXQJ1.pdf>

Original File Name: CARB written comments 12-13-15.pdf

Date and Time Comment Was Submitted: 2015-11-13 16:49:20

No Duplicates.



**Comment 96 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Damon

Last Name: Franz

Email Address: dfranz@solarcity.com

Affiliation: SolarCity

Subject: Second Triennial C&T Investment Plan - SCTY Comments

Comment:

Please find attached SolarCity's comments on the draft second triennial cap and trade investment plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/104-investplan2-ws-BXZSNwB1U3kGXwBj.pdf>

Original File Name: SCTY Comments Draft C\_T Investment Plan Final Nov 15 FINAL.pdf

Date and Time Comment Was Submitted: 2015-11-13 16:03:20

No Duplicates.

**Comment 97 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Sarah

Last Name: Aird

Email Address: sarah@pestidereform.org

Affiliation:

Subject: PAN & CPR Comments on Draft Second Cap-and-Trade Auction Proceeds Investment Plan

Comment:

Attached please find comments on the Cap-and-Trade Auction Proceeds Second Investment Plan prepared by Pesticide Action Network and supported by the 190+-member statewide coalition Californians for Pesticide Reform

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/105-investplan2-ws-WipSNQdoWVVWMVQ6.pdf>

Original File Name: PAN and CPR ARB Investment Plan Comments Nov 13 2015.pdf

Date and Time Comment Was Submitted: 2015-11-13 16:55:32

No Duplicates.

**Comment 98 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Linda

Last Name: Rudolph

Email Address: linda.rudolph@phi.org

Affiliation: Center for Climate Change and Health

Subject: Second Investment Plan

Comment:

Please see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/106-investplan2-ws-BmUCYVM8ByBWNQR2.docx>

Original File Name: Center for Climate Change and Health Draft 2nd Investment Plan  
Comments Nov 13 2015.docx

Date and Time Comment Was Submitted: 2015-11-13 16:58:43

No Duplicates.

## **Comment 99 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Ben  
Last Name: Russak  
Email Address: brussak@libertyhill.org  
Affiliation: Liberty Hill Foundation

Subject: Integrated Projects Comment Letter  
Comment:

November 12, 2015

Mary Nichols, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Re: Comments on Cap-and-Trade Auction Proceeds Second Investment Plan draft

Dear Chair Nichols and Air Resources Board Members:

We submit the following comments relating to the second Three-Year Investment Plan which will guide Greenhouse Gas Reduction Fund investment strategies from FY2016/17 through FY2018/19. We appreciate the significant efforts which ARB, the Department of Finance and member organizations of the Climate Action Team have put into creating such a comprehensive and thoughtful document and hope that our suggestions may further contribute to the plan's ability to meet the goals set forth in AB 32.

It is the responsibility of GGRF investment strategies to not only advance effective GHG-mitigation measures, but to also produce the greatest possible range of co-benefits and ensure the protection of California's most vulnerable populations from any unintended harms of funded development. Effectively prioritizing funding for projects most in the interests of DACs has been problematic. While individual program guidelines continue to include more language supporting robust co-benefits, authentic community engagement and proactive anti-displacement strategies, SB 535 funding has so far been allocated for investments that fail to emphasize equitable investments to the extent that community advocates hope to see.<sup>1</sup>

If this trend continues, billions of dollars may be invested in DACs that ultimately may not be in the best interests of low-income residents and local businesses. Investments must emphasize carbon-reduction strategies that address critical issues of economic resilience, non-GHG pollutants and public health. We are of the opinion that the integrated projects approach first proposed by the California Senate Budget Committee and subsequently outlined in the Cap-and-Trade Auction Proceeds Second Investment Plan draft has great potential to promote more comprehensive strategies with the power to transform DACs and ensure that the primary beneficiaries of all GGRF investments are the most vulnerable members of our society.

An integrated projects approach could address three issues that have greatly contributed to suboptimal DAC investments. First, there is a predominantly "siloed" approach to California Climate Investments that could be remedied by more flexible investment strategies. Programs by-and-large are focused either on energy efficiency, urban forestry, rail operations, waste diversion, freight infrastructure or other single issue objectives. The solutions needed to address the historic harms in environmental justice communities are unlikely to be found using such a fragmented approach.

The second issue impacting effective investments is the lack of accessibility of programs to local community-based organizations. The Strategic Growth Council's Affordable Housing and Sustainable Communities program and CAL FIRE's Urban and Community Forestry grants are the only two programs with widespread applicability in which nonprofit organizations may be primary applicants. However, the capital requirements of affordable housing development are beyond the capacity of most local nonprofits and the urban forestry program, which is the most oversubscribed grant due to its accessibility, is currently suspended pending the reconvening of the State legislature which may award the forestry program to another agency entirely.

Further confounding the meaningful participation of community-based organizations is the third issue of transparency. Funding for high speed rail, low carbon freight and the transit operations and rail capital programs is only available to public agencies, many of which operate with little inclusion of public opinion. Ensuring community members and local organizations are informed and engaged in determining these agencies priorities should be a primary concern of the GGRF.

For these reasons, we strongly suggest that an integrated investment strategy is not only implemented, but that it is structured in such a way that local organizations may directly apply in a streamlined manner that will not strain the resources of many groups. While as the draft states, "local governments with jurisdictions in these disadvantaged communities may be well positioned to identify projects that reduce GHG emissions to meet local needs and support community-wide transformation," it is often those in the nonprofit sector who are in the best position to convene and develop the most appropriate investment strategies in DACs.

California is home to a strong and diverse network of community and environmental justice advocacy groups which also includes many statewide and regional alliances, such as the California Environmental Justice Alliance, Asian-Pacific Environmental Network, Central California Environmental Justice Network, Bay Area Environmental Health Collaborative, and many others. To be most successful addressing the needs of DACs, California Climate Investments should leverage the exceptional skills and local knowledge across this network by ensuring that these organizations and broader alliances are also able to directly apply for integrated projects.

There are a multitude of shovel-ready projects that have innovative cross-cutting strategies to address GHG-reduction and many co-benefits. Additionally, these projects have been designed in collaboration with local residents and businesses possessing the

necessary knowledge of what their communities need most. Participatory processes employed include design charrettes, groundtruthing, community self-assessments and leadership development.<sup>2</sup>

There are also broader neighborhood scale sustainability plans proposed across the state which focus on the reduction of existing impacts and the prevention of the toxic exposure faced by California's most vulnerable communities. Many of these plans not only address carbon-reduction strategies systemically, but also revitalize local economic opportunities, provide incentives for the adoption of greener business practices by industrial operations and reinvest in infrastructure that supports the local community.<sup>3</sup>

We thank you for the opportunity to comment and would look forward to a more in-depth discussion with CARB and other agency staff regarding these ideas.

Sincerely,

Alfred Carrillo, Pastor  
Apostolic Faith Center

Dean S. Toji, Co-Chair  
Asian Pacific Planning and Policy Council (A3PCON) Environmental Justice Committee

Amy Vanderwarker, Co-Director  
California Environmental Justice Alliance

Drew Wood, Executive Director  
California Kids IAQ

Jesse N. Marquez, Executive Director  
Coalition for A Safe Environment

Bahram Fazeli, Director of Research & Policy  
Communities for a Better Environment

Ricardo Pulido, Executive Director  
Community Dreams

Gisele Fong, PhD, Executive Director  
EndOil / Communities for Clean Ports

Stella Ursua, President  
Green Education Inc.

Ben Russak, Policy Analyst  
Liberty Hill Foundation

Veronica Padilla-Campos, Executive Director  
Pacoima Beautiful

Cynthia Strathmann, Executive Director  
Strategic Actions for a Just Economy (SAJE)

Laura Muraida, Research Director  
Strategic Concepts in Organizing and Policy Education (SCOPE-LA)

Mary Creasman, Director of Government Affairs

Trust for Public Land

Sandra McNeill, Executive Director  
T.R.U.S.T. South LA

1 Advantaging Communities: Co-Benefits and Community Engagement in the Greenhouse Gas Reduction Fund, a report co-sponsored by the Liberty Hill Foundation, the UCLA Institute on Research for Labor and Employment and the UCLA Labor Center, provides a detailed community perspective of how the GGRF may better address the needs of DACs. Available online at <http://www.libertyhill.org/news/reports/advantaging-communities-co-benefits-and-community-engagement-greenhouse-gas-reduction>

2 Two examples of such projects would be Pacoima Beautiful's Pacoima Wash Vision Plan, which focuses on active transportation, urban greening and the capture and treatment of stormwater; and East Yard Communities for Environmental Justice's I-710 Freight Corridor Project, which incorporates the same elements as the Pacoima Wash plan along with expanded public transit and a zero-emissions freight corridor. More information on these programs may be found at <http://www.pacoimabeautiful.org/what-we-do/community-planning> and <http://eycej.org/campaigns/i-710/>

3 The Green Zone Initiative, led by the California Environmental Justice Alliance (CEJA), brings together several urban and rural pilot programs across California. Their report, Green Zones Across California: Transforming Toxic Hotspots into Healthy Hoods, is available at <http://caleja.org/what-we-do/greenzones/>

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/107-investplan2-ws-BzRWKV01ACMAWQEs.pdf>

Original File Name: 3YIP - Integrated Projects - Comment Letter FINAL.pdf

Date and Time Comment Was Submitted: 2015-11-13 16:52:26

No Duplicates.

**Comment 100 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Linda

Last Name: Rudolph

Email Address: linda.rudolph@phi.org

Affiliation:

Subject: Second Investment Plan

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/109-investplan2-ws-VDcAY1U6ACcKaVMh.docx>

Original File Name: Center for Climate Change and Health Draft 2nd Investment Plan  
Comments Nov 13 2015.docx

Date and Time Comment Was Submitted: 2015-11-13 17:00:38

No Duplicates.



**Comment 101 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Ryan

Last Name: Schuchard

Email Address: rschuchard@calstart.org

Affiliation: Policy Director, CALSTART

Subject: CALSTART Comments on Investment Plan

Comment:

CALSTART appreciates this opportunity to provide comments on the California Air Resources Board's Draft Investment Plan of Cap-and-Trade Auction proceeds for 2016-17 through 2018-19. Pleased find our comments enclosed.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/110-investplan2-ws-WzhQN1c6VnYBcwNi.pdf>

Original File Name: CALSTART Comments for CARB Draft CCI Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-11-13 16:53:14

No Duplicates.

**Comment 102 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: JOSEPH

Last Name: EDMISTON

Email Address: EDMISTON@smmc.ca.gov

Affiliation: SMMC

Subject: Comments on the Draft Cap-and-Trade Auction Proceeds Second Investment Plan  
Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/111-investplan2-ws-VCdROgFtVGQBWAng.pdf>

Original File Name: SMMC Comments on Draft Cap-and-Trade Auction Proceeds Nov 13.pdf

Date and Time Comment Was Submitted: 2015-11-13 16:39:13

No Duplicates.

## **Comment 103 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Sarah

Last Name: Deslauriers

Email Address: sdeslauriers@carollo.com

Affiliation: CA Wastewater Climate Change Group

Subject: Comments on the Cap-and-Trade Draft Second Investment Plan

Comment:

The California Wastewater Climate Change Group (CWCCG) and California Association of Sanitation Agencies (CASA) appreciate the opportunity to comment on the Cap-and-Trade Auction Proceeds Draft Second Investment Plan (Draft Investment Plan). We strongly support the inclusion of wastewater related projects as part of the Second Investment Plan, and recommend wastewater projects (and their co-benefits) be made more explicit in the listed investment concepts. Please contact us if you have any questions at (916) 446-0388 or via email at gkester@casaweb.org and sdeslauriers@carollo.com. We welcome the opportunity to further discuss the wastewater community's position in helping ARB proactively achieve the commendable State goals and mandates for 2020, 2030, and 2050.

Regards,  
Sarah A. Deslauriers  
CWCCG Program Manager

Greg Kester  
CASA Director of Renewable Resources Program

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/112-investplan2-ws-VGVRZgAsB2UCNwEs.pdf>

Original File Name: 11-13-15 CASA-CWCCG Comments\_DraftSecondInvestmentPlan.pdf

Date and Time Comment Was Submitted: 2015-11-13 16:49:14

No Duplicates.

**Comment 104 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Petrea

Last Name: Marchand

Email Address: petrea@conserosolutions.com

Affiliation: Yolo Habitat Conservancy

Subject: Comment Letter from the Yolo Habitat Conservancy

Comment:

To Whom It May Concern,

Please find attached the Yolo Habitat Conservancy's comment letter on the 2nd Investment Plan.

Thank you,

Petrea Marchand  
Executive Director

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/113-investplan2-ws-BWZWMQR1VVkDZFI8.pdf>

Original File Name: Cap and Trade YHC Letter FINAL 11.13.15.pdf

Date and Time Comment Was Submitted: 2015-11-13 17:25:48

No Duplicates.

## **Comment 105 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Justine

Last Name: Reynolds

Email Address: juss.reynolds@gmail.com

Affiliation: Sierra Resource Conservation District

Subject: Utilization of RCDs, Forest biomass, fire mitigation

Comment:

Thank you for this opportunity to provide comments on the Draft Second Investment Plan for Cap and Trade Auction proceeds. These comments are intended to serve in addition to those comments provided at the workshop in Fresno, CA on November 4, 2015. I would like to encourage the utilization of Resource Conservation Districts (RCDs) to connect with disadvantaged communities and create partnerships with other organizations at a local level. RCDs function is coordinate and provide land owners and residents of their district with resources including but not limited to resource conservation, education, and training. RCDs have a board of directors appointed by the board of supervisors from landowners in the district, and are uniquely positioned to understand and address the concerns of their district. Additionally, as a quasi-governmental agency, we are able to form interagency agreements and partnerships, as well as qualify for grants normally closed to state or federal entities. Sierra Resource Conservation District currently partners with NRCS on outreach to Hmong and Punjabi communities. We also have developed interagency agreements with Sierra Nevada Conservancy to accomplish unique tasks outside the scope of typical contract agreements. Other RCDs perform monitoring activities for other agencies. RCDs are uniquely situated to assist with your goals of engaging disadvantaged and rural communities, and meeting resource conservation management objectives.

I would also like to applaud you for your inclusion of forest biomass in your investment plan. Forest biomass is a real answer for rural foothill communities - not only does it reduce woodsmoke, generate renewable energy, and provide jobs, but it also addresses public safety concerns due to the unprecedented tree mortality event in the Sierra Nevada. I encourage you to continue to fund projects that support large scale forest restoration activities, which provides a sustainable source of forest biomass to keep rural facilities operation and available to communities for disposal of their private forest biomass. Additionally, utilization of forest waste biomass is important, but make sure your terminology is consistent with USFS Region 5 definitions, as the forest service would use the term submercantile biomass instead of waste. Biomass is not considered waste by the forest service, and it will further enable cooperation if your terminology is consistent with the largest manager of forest lands in the state.

The ability to pair multiple funding sources for one project is a great idea, but we do want to encourage the utilization of the same administrative process for these funding sources. It will maximize

the use of funds if there isn't a separate administrative burden for each grant, that they instead complement each other and work off of the same process. I understand that different agencies may have different reporting protocols internally as well as necessary tracking items, but there are grant management tools like FFAST and ZoomGrants that have been working to streamline grant processes.

Lastly, I would encourage you to give equal weight to the benefits of fire mitigation as carbon sequestration. Many forest restoration projects may seem less competitive under GGRF carbon emission reduction guidelines, as they remove trees and hence decrease carbon sequestration. The potential mitigation of high severity fire due to fuel reduction is difficult to analyze and therefore not well studied. That being said, those few studies, like the Mokolumne Cost-Avoidance Analysis study developed by Sierra Nevada Conservancy, which have been done shows huge fire mitigation benefits to fuel reduction.

Thank you again, this looks like an excellent investment plan for CA.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-11-13 18:16:25

No Duplicates.

**Comment 106 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Charles  
Last Name: White  
Email Address: cwhite1@wm.com  
Affiliation: Waste Management

Subject: Draft Triennial Expenditure Plan for C&T Revenues  
Comment:

Dear CARB --

Please accept the final letter from a coalition of organization involved with solid waste and recycling. I will be submitting a 2nd submittal form with the referenced attachments to this letter.

Our intent was to submit this earlier in the day, but was delayed due to internet difficulties.

Best --

Charles A. White, P.E.  
Consultant to Waste Management

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/115-investplan2-ws-UjECZVwvAjNSC1c0.pdf>

Original File Name: CARB CT InvstmentPlan SWIGComment 11-13-15.pdf

Date and Time Comment Was Submitted: 2015-11-13 19:31:47

No Duplicates.

**Comment 107 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Charles  
Last Name: White  
Email Address: cwhite1@wm.com  
Affiliation: Waste Management

Subject: Attachments to Coalition letter on Triennial Investment Plan for C&T Revenues  
Comment:

Dear CARB --

Attached are the referenced attachments to the Coalition letter sent to you earlier this evening on the subject. We are asking that these attachments be included in the docket for the comments submitted on the Draft Triennial Expenditure Plans as referenced in the letter we submitted earlier.

Best --

Charles A. White, P.E.  
Consultant to Waste Management

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/117-investplan2-ws-UTcCbVc4VmRROwdY.zip>

Original File Name: Final Coalition Letter to CARB.zip

Date and Time Comment Was Submitted: 2015-11-13 19:45:50

No Duplicates.



**Comment 108 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: John

Last Name: Wick

Email Address: johnwick@sonic.net

Affiliation:

Subject: Comments, Second Investment Plan

Comment:

Please see the attached comments, I appreciate the opportunity to submit them and congratulate the ARB on its work to protect our heath and environment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/118-investplan2-ws-Wi1SPQNhBDwCWwNq.docx>

Original File Name: Wick Investment Plan Comment Letter (1).docx

Date and Time Comment Was Submitted: 2015-11-13 21:08:24

No Duplicates.

## **Comment 109 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Torri

Last Name: Estrada

Email Address: testrada@carboncycle.org

Affiliation: Carbon Cycle Institute

Subject: Second Investment Plan Comments - Working and Natural Lands

Comment:

Dear Ms. Nichols and Ms. Livingston:

The Carbon Cycle Institute (CCI) appreciates this opportunity to comment on the California Air Resources Board's (ARB's) Draft Second Investment Plan (Plan). CCI is committed to addressing climate change by advancing science-based solutions, particularly in working and natural lands, that remove atmospheric carbon, while promoting environmental stewardship, social equity and economic sustainability. These comments are supplemental and reinforce the comments and recommendations made in CCI's comment letter submitted on August 30, 2015 in response to the ARB's draft concept paper. We are pleased by ARB's continued focus and refined strategies on Working and Natural Lands in the Plan. We also applaud the creation and diligent work of the Natural and Working Lands Working Group that is bringing together state agencies to develop the critical strategies identified in the Plan. The Plan creates a solid foundation and emerging framework to achieve climate change goals, including carbon sequestration and GHG reductions, in the Working and Natural Lands sector. CCI offers these comments to enhance and strengthen the strategies outlined in the Plan for Working and Natural Lands, including agriculture.

Thank you very much for the opportunity to comment on Plan. We plan to provide additional technical comments in December in advance revised Draft Plan. We have included (below) a summary of our recommendations from our August 2015 comment letter. If you have any questions regarding our comments, please do not hesitate to contact us. &#8232;

Sincerely Yours,

Torri Estrada

Managing Director/Director of Carbon Policy Director of Agroecosystem

Jeff Creque, PhD

Management

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/119-investplan2-ws-VTZUMVE5BwsBZFI9.docx>

Original File Name: CCI Comments Letter- Draft 2nd Investment Plan .docx

Date and Time Comment Was Submitted: 2015-11-13 21:12:58

No Duplicates.

## **Comment 110 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Rick

Last Name: Woodbury

Email Address: rick@commutercars.com

Affiliation: Commuter Cars Corp

Subject: Jump start a market driven solution to air pollution and GHG production

Comment:

The most effective way to get the majority of commuters to drive pure electric cars is to offer them a major benefit that they can't get with their gasoline or diesel cars. The Tango commuter car is the only car that can double lane capacity and quadruple parking capacity without giving up any comfort or safety, and in fact, increases safety, accident avoidance, speed, convenience, and pleasure of driving.

Many years ago I suggested to Dr. Lloyd that I could license the patent for this car to the State of California at no charge for 100,000 Tangos. He thought that CA would do this if it weren't \$32-billion in debt at the time. The Tangos could be put out to bid to automotive companies, or other potential manufacturers. I would expect that fully-certified Tangos could be delivered for \$20k each at 100,000 volume. They could be rented out to commuters who would not have to commit in order to test drive these. Once they did, and saw the convenience, a huge market of possibly 50% or more of all single-occupant computers would take off. Please see attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/120-investplan2-ws-BXEBZIU6VGAKYwFx.zip>

Original File Name: TangoPresentation.zip

Date and Time Comment Was Submitted: 2015-11-13 21:33:26

No Duplicates.

**Comment 111 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Humberto

Last Name: Lugo

Email Address: humberto@ccvhealth.org

Affiliation: Comite Civico del Valle, Inc.

Subject: Draft Second Investment Plan Comments

Comment:

See attachment for comment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/121-investplan2-ws-AWJQOVc7WWcLaFU7.pdf>

Original File Name: comment.pdf

Date and Time Comment Was Submitted: 2015-11-16 09:12:25

No Duplicates.

**Comment 112 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Johannes D.

Last Name: Escudero

Email Address: johannes@rngcoalition.com

Affiliation: Coalition For Renewable Natural Gas

Subject: RNG Coalition Comments on Cap-and-Trade Auction Proceeds Draft Second Investment Plan

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/122-investplan2-ws-VCZROVI0Aw8GYwFu.pdf>

Original File Name: RNG Coalition Comments - Second Investment Plan Comments.pdf

Date and Time Comment Was Submitted: 2015-11-16 11:05:30

No Duplicates.

## **Comment 113 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Stephen

Last Name: Miller

Email Address: stephen@seiinc.org

Affiliation: Strategic Energy Innovations

Subject: Comments from Sustainable Energy Roadmap to Second Draft of GGR Investment Plan  
Comment:

Thank you for the opportunity to submit comments on your Draft Cap-And Trade Auction Proceeds Triennial Investment Plan. Strategic Energy Innovations [www.seiinc.org](http://www.seiinc.org), a California based non-profit organization, is currently a major partner in the Sustainable Energy Roadmap (SER) program [www.sustainableenergyroadmap.com](http://www.sustainableenergyroadmap.com) funded through the Strategic Growth Council. The purpose of this program is to assist a cohort of 20 jurisdictions in the San Joaquin Valley develop plans, and set, and pursue goals relating water conservation, smart growth, transportation, land use, climate and energy. As a core focus of this effort, the SER implementation team is reaching out to and engaging environment justice (EJ) organizations and disadvantaged communities in this process to ensure that these entities are aware of and involved in critical community sustainability efforts. As we have rolled out this project with over the last few months, we have found that jurisdictions are interested in learning in learning best practices and want to set and pursue sustainability and climate goals to achieve these best practices. We have discovered many innovative projects underway in the San Joaquin Valley in the areas of clean transportation and sustainable communities as well clean energy and energy efficiency. We have also found a number of great ideas in the EJ organizations about how they might collaborate to achieve climate and sustainability goals and pursue needed resources from the state and other sources. We see significant opportunities to achieve substantive climate goals in the San Joaquin Valley through a Disadvantaged Communities (DACs) cross cutting project focused in the Valley. While many individual projects are being crafted to deal with unique needs of the clean transportation, clean energy and energy efficiency sectors, there is a need for the state financial support to develop a regional plan and support regional efforts detailing how key Valley EJ organizations and Disadvantaged Communities will develop and coordinate cross cutting approaches to greenhouse gas reduction in the Valley. We recommend that you that the final Triennial Investment Plan and subsequent program guidance allow and provide support for this type of regional planning and collaboration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-11-16 13:09:30

No Duplicates.



**Comment 114 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Jim

Last Name: Hawley

Email Address: jim.hawley@deweysquare.com

Affiliation: representing Aclara

Subject: Aclara comments regarding Cap-and-Trade Auction Proceeds Draft Second Investment Plan

Comment:

Please find enclosed Aclara's comments regarding the Cap and Trade Auction Proceeds Draft Second Investment Plan. These were filed Friday, November 13, but via another portion of the Air Board website. Please do not hesitate to contact me with any questions or if the document fails to attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/124-investplan2-ws-AWBQNQZrUGIHcwlo.pdf>

Original File Name: Aclara comments re Draft Second Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-11-16 15:36:41

No Duplicates.

**Comment 115 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Claire  
Last Name: Halbrook  
Email Address: cehu@pge.com  
Affiliation: PG&E

Subject: PG&E Comments on Draft Investment Plan  
Comment:

PG&E Comments on Draft Investment Plan

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/125-investplan2-ws-AnIHZl05VFgKbwdo.pdf>

Original File Name: PGE Comments on ARB Draft Investment Plan Nov 18.pdf

Date and Time Comment Was Submitted: 2015-11-18 16:19:45

No Duplicates.

**Comment 116 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Wendy

Last Name: Butts

Email Address: wbutts@lacorps.org

Affiliation:

Subject: Draft Cap-and-Trade Auction Proceeds 2nd Investment Plan: FYs 2016-17 - 2018-19  
Comment:

Please see attached letter.

Thank you,  
Wendy Butts  
Chief Executive Officer  
LA Conservation Corps

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/126-investplan2-ws-WikAZF0DVzFXYgk8.pdf>

Original File Name: SB 535 Letter.pdf

Date and Time Comment Was Submitted: 2015-11-18 16:54:51

No Duplicates.

**Comment 117 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Kim J.

Last Name: Tran

Email Address: kim.j.tran@lacity.org

Affiliation: City of Los Angeles Bureau of Sanitation

Subject: City of Los Angeles Bureau of Sanitation Comments on the 2nd Investment Plan Draft  
Comment:

Dear Ms. Nichols:

On behalf of Mr. Enrique Zaldivar and The City of Los Angeles Bureau of Sanitation (LASAN), attached please find LASAN's letter of comments in response to your request for comments and public input on the Draft Cap-and-Trade Auction Proceeds Second Investment Plan.

Please do not hesitate to contact Kim J. Tran with any questions.

Sincerely,

Peggy Nguyen, Environmental Supervisor II  
LASAN  
1149 S. Broadway, Suite 500  
Los Angeles, CA 90051

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/128-investplan2-ws-VjVSO1E9UG4BYgZo.pdf>

Original File Name: Comment Letter on 2nd Investment Plan.pdf

Date and Time Comment Was Submitted: 2015-11-19 15:43:07

No Duplicates.

**Comment 118 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Kaylon

Last Name: Hammond

Email Address: khammond@leadershipcounsel.org

Affiliation:

Subject: Comments from San Joaquin Valley Residents

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/129-investplan2-ws-UWMAaF04AAwEa1Q6.pdf>

Original File Name: 2nd Investment Plan Letter from Residents.pdf

Date and Time Comment Was Submitted: 2015-11-20 14:38:39

No Duplicates.

**Comment 119 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Cynthia

Last Name: Cory

Email Address: ccory@cfbf.com

Affiliation: California Farm Bureau Federation

Subject: Cap-and Trade Auction Proceeds Second Investment Plan

Comment:

Please find our comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/130-investplan2-ws-WjlVMIwtWWsDa1M3.pdf>

Original File Name: capandtradecmts2015.pdf

Date and Time Comment Was Submitted: 2015-11-20 17:01:47

No Duplicates.

**Comment 120 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Brian

Last Name: Wilson

Email Address: bwilson@ncuaqmd.org

Affiliation: North Coast Unified AQMD

Subject: Support for Wood Heating Device Change Out Program in Second Investment Plan  
Comment:

Please see attached PDF letter dated December 10, 2015

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/131-investplan2-ws-WjRVMFwoWWtSJQJv.pdf>

Original File Name: NCUAQMD Support of Wood Stove Heating Device Change Out in Plan, 12-10-15.pdf

Date and Time Comment Was Submitted: 2015-12-10 11:19:17

No Duplicates.

**Comment 121 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Louis D.

Last Name: Van Mullem

Email Address: VanMullemD@sbcapcd.org

Affiliation: Santa Barbara County APCD

Subject: Comments on Cap-and-Trade Auction Proceeds 2nd Investment Plan

Comment:

Please see attached for Santa Barbara County Air Pollution Control District comments on the Cap-and-Trade Auction Proceeds 2nd Investment Plan.

Thank you,

Louis D. Van Mullem, Jr.

Air Pollution Control Officer

Santa Barbara County Air Pollution Control District

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/132-investplan2-ws-USIHY1IwBTdQJlQ3.pdf>

Original File Name: sbcapcd-12-10-15-Cap-Trade-Proceeds-Plan2.pdf

Date and Time Comment Was Submitted: 2015-12-10 13:41:26

No Duplicates.



**Comment 122 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Gretchen

Last Name: Bennitt

Email Address: gretchen@myairdistrict.com

Affiliation: Northern Sierra Air District

Subject: Support for Wood Heating Device Change Out Program in Second Investment Plan  
Comment:

Support for wood heating device change out program

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/135-investplan2-ws-AHMGaVA2BzoKaQlt.pdf>

Original File Name: signed copy of cap and trade december 2015.pdf

Date and Time Comment Was Submitted: 2015-12-11 14:35:30

No Duplicates.

**Comment 123 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Dave

Last Name: Johnston

Email Address: dave.johnston@edcgov.us

Affiliation: County of El Dorado

Subject: Comments

Comment:

Please see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/136-investplan2-ws-UDUFZ1EzVVkKewdo.pdf>

Original File Name: EDC Wood Stove Replacement Support.pdf

Date and Time Comment Was Submitted: 2015-12-11 14:47:34

No Duplicates.

## **Comment 124 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Gordon

Last Name: Piper

Email Address: rgpiper33@gmail.com

Affiliation: Retired Civil Rights Agency admin.

Subject: Comments to ARB Draft Cap-and-Trade-Auction Proceeds Second Investment Plan:  
Fiscal Year

Comment:

The Draft Second Investment Plan, like the First Investment Plan, is in direct conflict with State and Federal Constitutional requirements and Civil Rights and Environmental laws and regulations. It needs to be amended to bring the plan, policies, regulations and programs back into compliance and avoid perpetuating systemic and pervasive discrimination. By providing benefits and services to only 25% of the California census tracts largely to the exclusion of the other 75%, are in direct conflict with:

1. The Equal Protection clause in the California Constitution prohibiting discrimination by government agencies and guaranteeing that no person is discriminated against by government agencies and guaranteeing that no person is discriminated against by State government agencies;
2. The California Unruh Civil Rights Act prohibition against arbitrary discrimination in the provision of services, privileges and advantages by a public agency based on considerations of race, color, national origin, ancestry, and geographic location and that mandates each person be entitled to equal services, privileges, and advantages in the State of California;
3. The Equal Protection clause in the 14th Amendment to the United States Constitution which prohibits discrimination by State and local government agencies and provides that no state shall deny to any person within its jurisdiction "the equal protection of the laws" ;
4. Government Code Section 11135 (a) which states that no person is denied the right to participate in or the benefits of a program receiving State assistance; and also in the implementing Regulations in the California Code of Regulations Title 22 Sections 98211 (c) and 98100;
5. California Constitution prohibitions against affirmative action and preferential-treatment-based considerations of race, color, national origin or ancestry in public contracting and public employment;
6. California Resources Code Section 71110 in the California Resources Code which mandates The California Environmental Protection Agency, in designing its mission for programs, policies, and standards shall do all of the following: (a) Conduct its programs, policies, and activities that substantially affect human health or the environment in a manner that ensure the fair treatment of all races, cultures, and income levels, including minority populations and low income populations of the state", but which has not been effectively complied with by either CAL EPA or

the ARB in its current Cap-And-Trade Auction Proceeds Interim Guidance to Agencies that Administer Greenhouse Gas Reduction Funds Monies, the September 4, 2015 ARB proposed Cap-and-Trade Proceeds Funding Guideline for Agencies that Administering California Climate Investments and the Draft Second Investment Plan.

7. The California Fair Employment and Housing Act and implementing regulations that are supposed to ensure nondiscrimination in employment practices related to hiring, terminating or training;

8. In 1996, the voters approved Proposition 209. Section 31 of Article I in the California Constitution prohibits discrimination against any individual or group on the basis of race, color, ethnicity or national origin in the operation of public employment or contracting. The preferential treatment in the First Investment Plan and the proposed continuation of preferential treatment in the Draft ARB Second Investment Plan, unless revised, could continue undercut this ban on affirmative action and preferential treatment in public contracts and public employment.

9. Title VI of the Civil Rights Act of 1964 and implementing Title VI regulations of Federal agencies in relation to the Effectuation of Title VI compliance that apply to State agencies that accept Federal funds and combine those with State GGRF funds for programs that do not comply with the various equal treatment and non-discrimination requirements outlined in Title VI and the implementing Regulations for ensuring equal treatment and non-discrimination and that require that "no person is denied the right to participate in or the benefits of a program receiving Federal assistance; and

10. Title VII of the Civil Rights Act of 1964 with respect to the requirements for non-discrimination in employment practices related to hiring, terminating or training.

There is substantial evidence that the proposed Second Investment Plan like the First Investment Plan is really very much like "a Pandora's box" that:

1. Perpetuates "environmental racism" and racial discrimination in violation of State and Federal civil rights laws and regulations;

2. Violates constitutional "equal protection" requirements in the California Constitution and U.S. Constitution that are supposed to bar discrimination by public agencies in their services, benefits and in providing access to benefits to all persons;

3. Is inconsistent with the State of California's codified definition of "environmental justice" found in Government Code Section 65040.12 that states "environmental justice means the fair treatment of people of all races, cultures, and incomes with respect to the development adoption, implementation, and enforcement of environmental laws, regulations, and policies";

4. Some of the allocations made in the First Investment Plan and discussed in the Draft Second Investment Plan reference specific Legislation passed in 2012 that provided a framework for how the Cap-and-Trade auction proceeds would be appropriated and expended. The ARB staff focused only on AB 1532, SB 535 and SB 1018 as the driving force behind their interpretation of how the allocations had to be appropriated and expended. But there are other laws, such as the Civil Rights laws and codified definition of Environmental Justice that require state actions to be fair to all races, incomes and geographic locations to benefit all California residents. The ARB and other state agencies must ensure that their policies and actions don't ignore the equal protection mandates in the state and federal laws and are fair to all races, cultures and incomes despite recently approved environmental laws that may have provisions that conflict with requirements of other State Civil Rights Laws or Constitutional requirements. Rather, the Second Year Investment Plan should stop these violations and correct the

approach by strengthening the balance of investments to benefit all races, cultures, incomes and all geographic locations;

5. Covers up and fails to reference and address the series of discriminatory implementing guidelines, procedural manuals, and requests for proposals developed by either the Air Resources Board and different State agencies administering GGRF fund investments and programs, including the ARB's "Cap-and-Trade Auction Proceeds Interim Guidance to Agencies Administering Greenhouse Gas Reduction Fund Monies" issued November 3, 2014 and the draft ARB "Cap and Trade Auction Proceeds Guidance to Agencies Administering California Climate Investments" ;

6. By targeting funding to only communities of color which comprise 25% of California's census tracts and only half of its counties, and redlining individuals and organizations that might qualify for these funds and grants who live in the other 75% of the census tracts, the State of California's discriminatory use of federal funds for the Low Income Weatherization Program, the Green Trees for the Golden State Tree Planting Grant Program, High Speed Rail Program and many more similarly funded Greenhouse Gas Reduction Fund (GGRF) programs violate Title VI, in direct conflict with these agencies' written certifications to Federal agencies that they will comply with Title VI when they accept Federal funds;

7. Undercuts the AB 32 goal of maximizing the economic benefits to all California, the Green House Reduction benefits to all California, and health benefits to all geographic locations in California and the environmental benefits to all geographic locations in California;

8. The Investment Plan forces state agencies and grantees to engage in preferential treatment of so-called disadvantaged communities targeting most benefits to minority communities of color which conflicts with the requirements of the Unruh Civil Rights Act, the equal protection clauses in the California and US Constitutions, and the prohibition against preferential treatment/affirmative action related to race in section 31 of the California Constitution;

9. The ARB pilot program of providing technical assistance exclusively to disadvantaged communities, which primarily benefited minority communities of color and highlighted in the draft ARB Second Investment Plan, appears to undercut the provisions of the Unruh Civil Rights Act and Title VI. CAL FIRE provided this type of technical assistance program using Title VI funds, but did not offer technical assistance to potential applicants who were not in disadvantaged communities;

10. The language concerning co-benefits promoting jobs and training in disadvantaged communities in both the Second Year Investment Plan and ARB's Draft Guidelines needs to be revised. Letting it stand encourages disparate treatment and disparate impact on hiring and training that favors primarily communities of color and denies opportunities to millions of non-Hispanic Caucasians and whites who are more likely excluded from these programs and co-benefits. To maximize the economic benefits to all California through GGRF fund investments, the Second Year Investment Plan needs to go beyond the 25% census tracts and ensure that these benefits and services are available to all geographic locations. Not doing so can create significant legal liability for the ARB and the other governmental agencies, nonprofit subcontractors and grantees that rely on ARB's procedures and assume they are consistent with State and Federal law;

11. Ignores the language in AB 32 (38592) (b) that states: Nothing in this division shall relieve any person, entity, or public agency of compliance with other applicable federal, state, or local laws or regulations, including state air and water quality requirements,

and other requirements for protecting public health or the environment. Ignores AB 32 (38596) that states: The provision of this division are severable. If any provision of this division or its application is held invalid, that invalidity shall not affect other provisions or applications that can be given effect without the invalid provision or application. No where does the Second-Year Investment Plan or the guidance to state agencies administering these GGRF funds mention the mandate to comply with State and Federal nondiscrimination laws;

12. The First Investment Plan and the ARB's Interim Cap-and-Trade Guidance and Draft Final Guidance used faulty CalEnvrioScreen 2.0 methodology developed by the California Environmental Protection Agency that disparately impacts a huge class of millions of non-Hispanic-Caucasians or whites, and provides a disproportionately large share of GGRF benefits would go to minority communities of color in 25% of California census tracts. The US Justice Department's Title VI manual indicates that the evidence of disparate treatment and disparate impact can be used to establish a violation of Title VI. California courts will also look at disparate treatment and disparate impact as evidence of intent to discriminate. The ARB needs to change the Draft Second Investment Plan and the use of CalEnviroScreen 2.0 to avoid perpetuating these violations;

13. Major funded GGRF programs such as High Speed Rail, the Low Income Weatherization Program and Urban and Community Forestry Grant Programs received close to 100% of the funding to disadvantaged communities that involved improper use of State and Federal funds in violation of the requirements of California's Unruh Civil Rights Act, Title VI of the Civil Rights Act of 1964 and the Title VI certifications of State agencies that require they comply with Title VI and the detailed requirements of the Title VI Regulations of Federal agencies. The percentages for targets in many of these programs are significantly above the 25% standard that was originally established for benefitting disadvantaged communities or the 10% of GGRF funds going to projects located within disadvantaged communities. Unless changes are made, the ARB's Draft Second Year Investment Plan continues these program targets and recommends many of the same investments for GGRF funds which will perpetuate these violations and appear to grant arbitrary privileges or advantages in violation of these laws;

14. The Draft Second Year Investment Plan does not delineate the percentages, but based on the charts that attached to the plan, the percentages will continue to exceed the 25% standard—in many cases 100% of the funding going to only disadvantaged communities, despite these conflicts with state and federal non discrimination laws;

15. There is a continuing intent to perpetuate this systemic and pervasive discrimination, despite my providing significant evidence of discrimination to staff in California Environmental Protection Agency, ARB, the Department of Justice, Department of Fair Employment and Housing, the California Governor, the Governor's Office of Planning and Research, the Department of Finance that developed First Investment Plan, and individual agencies including CAL FIRE and California Department of Community Services and Development. No changes have been made to date, and the Draft Second Year Investment Plan continues to overlook these violations;

16. A staff member in the Department of Finance revealed in early 2015 that some programs selected for GGRF investments in FY2014-2015 (such as the High Speed Rail Program) had little or nothing to do with Greenhouse Gas Reduction goals. To achieve the set aside standards and balance the large amount of funds going to

non-GGRF goals, the Finance Department raised the allocation for investment for disadvantaged communities for the \$17 million in GGRF funds in urban forestry programs at CAL FIRE to 100%. This is a continuing and growing problem, as the allocations for the High Speed Rail Program have doubled this year, putting further pressure to increase the percentage of funds going to disadvantaged communities in the remaining GGRF-funded programs. This "tail wagging the dog" in terms of funding percentages that were reflected in the First and now the Draft Second Investment Plan is driving some violations of the requirements of State and Federal laws, regulations and Constitutional prohibitions against affirmative action and preferential treatment. It appears political expediency is taking precedence over Constitutional law and requirements of State and Federal Civil Rights law and regulations.

The ARB should take a clear stand correcting the past mistakes and ensuring that the use of GGRF funds is managed in a fair and equitable manner, without violating State and Federal prohibitions against discrimination. The Draft Second Year Investment Plan should:

1. Recommend that the Legislature amend the SB 535 in terms of the framework that is putting such a heavy emphasis on maximizing the benefits, to make these programs fair to all races, cultures and incomes, and in all geographic locations, or work with State Department of Justice to address provisions in SB 535 that appear to be unconstitutional and in conflict with requirements of other State and Federal laws;
2. Change the percentages of funding designated for disadvantaged communities and open up the GGRF programs in FY 2016-17- and FY 2018-19 to competitive applications for projects in any of the 8000 California census tracts;
3. Set aside \$25 million a year or 75% of the amount of funding allocated in FY2015-16 and FY 2016-17 for the State Urban and Community Forestry Program for competitive, non-discriminatory tree planting and tree maintenance grant programs, to be administered by California ReLeaf and the California Urban Forest Council for projects in California;
4. Eliminate or modify CalEnviroScreen2.0 so that there is no longer disparate treatment and disparate impact to counties and census tracts not considered disadvantaged communities under current CalEnviroScreen2.0 criteria;
5. So that the current ARB Interim Guidelines for Agencies Administering Greenhouse Gas Reduction Funds comply with State and Federal Civil Rights laws, suspend the use of discriminatory guidelines and replace them with new guidelines that allocate investments in a non discriminatory manner and are fair to all races, cultures and incomes;
6. Require extensive training of staff responsible for developing and implementing state programs on the requirements of Title VI and Title VII of the Civil Rights Act of 1964, the Unruh Civil Rights Act, Government Code Section 11135 (a) and Section 31 of Article I in the State Constitution barring preferential treatment as it relates to drafting and implementing policies and regulations. In particular, CAL FIRE executive, legal and grant staff and staff for the urban and community forestry program, California Department of Finance staff, California Department of Community Services and Development, California Air Resources Board Staff and California Environmental Protection Agency staff;
7. Provide annual training and clear, easy to understand and up-to-date educational material on what certification of compliance with Title VI and the Title VI regulations of application Federal agencies for state agencies, non-State agencies and nonprofits that

receive funds and grants for technical assistance on behalf of GGRF-funded programs that are combined with Federal funds.;

8. Conduct regular monitoring and compliance review of all certifications, and of all proposed Cap-and-Trade Auction Proceeds Investment Plans, proposed grant guidelines and requests for proposals to ensure that they comply with non-discrimination laws at the State and Federal level.

I have spent more than a year since October 2014 conducting research on the initial GGRF funded programs and the Cap-and-Trade Auction Proceeds First Investment Plan and Draft Second Plan. I would be happy to share details of my research to assist the ARB in correcting these serious and rampant violations. I may be reached at rgpiper33@gmail.com.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/137-investplan2-ws-Vm5Uf1xvWtkBKldm.docx>

Original File Name: 8-23-15 Comments To California Air Resources Board re GGRF Guidelines (1).docx

Date and Time Comment Was Submitted: 2015-12-13 17:25:57

No Duplicates.



**Comment 125 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Robert

Last Name: Scaglione

Email Address: scaglior@co.mendocino.ca.us

Affiliation: Mendocino County AQMD

Subject: Support for Wood Stove Change Out Program

Comment:

Please accept the following letter from the Mendocino County AQMD.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/138-investplan2-ws-VyBWPwFvV2BQJQZy.pdf>

Original File Name: woodstove support letter- mendo dec 2015.pdf

Date and Time Comment Was Submitted: 2015-12-14 08:18:21

No Duplicates.

**Comment 126 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Kristin

Last Name: Hall

Email Address: khall@tehcoapcd.net

Affiliation:

Subject: Support for Wood Stove Change Out Program

Comment:

Please accept the following comments from the Tehama County APCD.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/139-investplan2-ws-AXUBYI00WGpSOVQ1.pdf>

Original File Name: Tehama County Woodstove change out- dec 2015.pdf

Date and Time Comment Was Submitted: 2015-12-14 08:23:16

No Duplicates.

## **Comment 127 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Anna

Last Name: Ferrera

Email Address: aferrera@m-w-h.com

Affiliation: School Energy Coalition

Subject: Revised Draft Second Investment Plan for Fiscal Years 2016-17 through 2018-19

Comment:

December 14, 2015

Dear Air Resources Board:

On behalf of the School Energy Coalition (SEC), an organization made up of K-14 schools and associate members focused on energy and water efficiency projects for California's students, I am writing to provide comments on the Cap and Trade Auction Trade Proceeds Investment Plan in anticipation of the December 17, 2015 hearing.

SEC appreciates the changes that have recently been made to the Cap and Trade Investment Plan (CTIP) recommending that school projects become an active part of the state's strategy for auction revenue to reduce greenhouse gas (GHG) emissions, thus addressing the very serious issue of global climate change.

With over 10,000 school buildings in over 1,000 school districts throughout the state SEC believes that California schools should be key partners in assisting the state to meet GHG reduction targets. According to the Collaborative on High Performing schools (CHPS), one in five Californians spends their day in a K-12 school and schools contribute roughly 5-8% of California's GHG emissions.

In addition, we urge that a new energy and water school grant program be considered along with funding for technical assistance for schools who wish to build upon the energy efficiency work they are already doing under the Proposition 39 program. We have a unique opportunity to leverage the timely work that is being done under program such as baseline data, analysis, and benchmarking that are required for Proposition 39 funding.

This program is allowing schools to take the first steps toward better and more efficient use of energy, but this funding does not go far enough to do the deep retrofits that could make a real difference toward lowering GHG throughout the state. Schools are poised to do so much more with regard to efficiency and renewable - and now more than ever schools are poised to attain "zero net energy" status.

Water projects should also be a priority because we know that it takes an extraordinary amount of energy to move water to where it is needed. Public school districts are often in charge of many acres of lawn in cities and towns across the state - and have been identified as large water users by water districts.

Projects that conserve or more efficiently use or re-use water will contribute greatly to lowered greenhouse gas emissions and educating the users of tomorrow, our students. Schools are already struggling to meet the state's emergency water mandates while keeping up playfields and ensuring that they are safe for students and other community members who may share these facilities.

In addition, funding for addressing long-term ongoing water use through landscaping and infrastructure - such as purple pipe - could go a long way toward allowing schools to take real, permanent action and save millions of gallons of water annually. We are also able to easily identify those schools in disadvantaged communities through our free and reduced price meal data.

Finally, we ask that a thorough review of existing energy, water and transportation programs be made to ensure that school projects specifically have priority access or separately designated funding under the plan. Schools already have state agency partnerships with the Department of Education, the California Energy Commission, and now the Water Board on programs such as Prop 39 and the Drought Response Outreach Program for Schools (DROPS).

Schools are a sure way to ensure that every community has public projects that they can be proud of and teaches consumers of tomorrow about conservation and efficiency to address climate change. We look forward to working with you to ensure that schools are an active part of the plan to lower greenhouse gas emissions throughout California.

Sincerely,

Anna Ferrera  
Executive Director

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/140-investplan2-ws-BmdVIVEyUI5QNQFg.pdf>

Original File Name: ARB Cap and Trade Investment Plan Letter 121415.pdf

Date and Time Comment Was Submitted: 2015-12-14 10:49:52

No Duplicates.

**Comment 128 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: JOSEPH

Last Name: EDMISTON

Email Address: edmiston@smmc.ca.gov

Affiliation:

Subject: Open Space in Revised Draft Cap-and-Trade

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/141-investplan2-ws-WmtRZQAvUjALPFR6.pdf>

Original File Name: 12.11.2015 SMMC Revised Draft Comments.pdf

Date and Time Comment Was Submitted: 2015-12-14 11:18:12

No Duplicates.

**Comment 129 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Tim

Last Name: Anderson

Email Address: tim.anderson@scwa.ca.gov

Affiliation: Sonoma County Water Agency

Subject: Sonoma County Water Agency Investment Plan Comments

Comment:

Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/142-investplan2-ws-VSZRNFwqUWMAWVU0.pdf>

Original File Name: SCWA ARB INVESTMENT PLAN COMMENT LETTER 121415.pdf

Date and Time Comment Was Submitted: 2015-12-14 11:25:36

No Duplicates.

**Comment 130 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Cory  
Last Name: Bullis  
Email Address: cory@csgcalifornia.com  
Affiliation:

Subject: Big Sur Land Trust Comments on the Revised Draft for the Second Investment Plan  
Comment:

Hello,

Attached are Big Sur Land Trust's comments on the revised draft for the second investment plan. Please let me know if you have any questions.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/143-investplan2-ws-AWNcKQdqVnEAWQJh.pdf>

Original File Name: BSLT comments on Revised Draft Investment Plan Air Resources Board 12.14.15.pdf

Date and Time Comment Was Submitted: 2015-12-14 11:45:39

No Duplicates.

## **Comment 131 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Sharon

Last Name: Danks

Email Address: sharon@greenschoolyards.org

Affiliation:

Subject: Support a "Sustainable Schools Grant Program" in California's ARB Investment Plan 2016-19

Comment:

Dear California Air Resources Board,

Thank you for revising the Draft Investment Plan to ensure that K-12 public schools are eligible to receive AB-32 funds! This is an important step in creating sustainable communities with numerous co-benefits. Green Schoolyards America signed a group letter submitted by Green Schools Initiative, and we wish to add additional information to further explain the value of directing a portion of your green infrastructure investments to school grounds. A "Sustainable School Grants Program" would allow schools to implement integrated infrastructure projects that could span all three ARB categories: Transportation and Sustainable Communities; Clean Energy and Energy Efficiency; and Natural Resources and Waste Diversion. By creating model environments at schools, the next generation learns how to be responsible stewards of the environments.

Public school districts are one of the largest landowners in almost every city and town across the United States and around the world. In California alone, over 10,300 schools in more than 1,000 school districts serve more than 6 million pre-kindergarten to 12th grade students each year, on more than 125,000 acres of publicly-owned land. Choices made by school districts about how they manage their buildings and grounds profoundly impact their cities and generations of residents across our state whose perspectives are shaped through daily experiences at school.

The green school ground field is gaining momentum around the world, weaving the ideas of urban sustainability, climate change mitigation and ecological design together with academic achievement, public health, children's wellbeing, sense of place, and community engagement. Green schoolyards bring nature back to cities and suburbs by transforming barren asphalt and ordinary grass into vibrant places for learning and recreation, set within the context of the rich, local ecosystems that nurture wildlife and the natural processes that underlie and sustain our urban environment.

The California state government passed a resolution in 2014 (ACR-128, Ting), recognizing the importance of improving ecological infrastructure on land managed by public schools and connecting it to children's academic achievement and health. The resolution urges "the State Department of Education, school districts, county



offices of education, and charter schools to continue to prioritize the design and construction of student-accessible green space on school campuses and to integrate use of this space into the teaching of standards based curriculum." We believe that investments from the Greenhouse Gas Reduction Fund should be used to help public school districts build outdoor park-like spaces that serve both as green infrastructure and benefit the local community and students. Sustainable communities cannot be achieved without including schools in the planning process.

Most of California's urban school grounds are covered with asphalt and concrete that have high surface temperatures, often 20 to 40 °C hotter than vegetated areas. Heavily paved campuses—most common in disadvantaged communities—contribute directly to urban heat island effects and atmospheric warming, and create unhealthy conditions for children. Paved, impermeable surfaces also carry polluted runoff into our natural water systems. By removing schoolyard asphalt, planting trees, and allowing stormwater to infiltrate onsite, surface temperatures can be decreased, carbon can be sequestered in the soil, and financial savings can be achieved through reduced reliance on municipal water and sewage treatment. These improvements, if placed in student-accessible locations on school campuses, also greatly improve children's experience at school.

Investing in green infrastructure on school grounds is a way to address climate change equitably, while bringing nature to parts of our cities that lack green space. Studies have shown that exposure to nature reduces stress, aids social cohesion and helps students' concentration and academic achievement. Air quality problems are also of particular concern for schools since children's smaller body size, faster metabolism and weaker immune systems leave them particularly vulnerable to ozone, carbon and particulate matter (PM10). Several studies correlate the increased presence of these elements with increased sick days for local school children.

Green school grounds benefit students, their schools, and their communities in the short-term by increasing physical activity, promoting healthy food choices, and providing valuable hands-on experiences in outdoor classroom settings, while making the physical environment more resilient, healthy, comfortable and enjoyable. The long-term benefits of green schoolyards multiply over time: Not only are they highly visible community hubs, but by incorporating stewardship and environmental education into the physical school grounds and school curricula, students grow up to become adults who care for their environment.

Our future needs citizens who understand complex environmental issues and can help to find solutions to ongoing problems. Investing in climate change mitigation measures on school grounds will help solve the growing climate problems we now face, while also preparing our children to be the environmental leaders of tomorrow.

Thank you for considering our perspective on including schools as part of California's solution for mitigating climate change.

Sincerely,  
Sharon Danks

CEO, Green Schoolyards America  
Berkeley, CA

sharon@greenschoolyards.org

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/144-investplan2-ws-VzZTN1NhWDkLUII1.pdf>

Original File Name: AB32\_GSA-Comments-Dec14.pdf

Date and Time Comment Was Submitted: 2015-12-14 12:26:28

No Duplicates.

## **Comment 132 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Anthony  
Last Name: Knight, Ed.D.  
Email Address: tknight@opusd.org  
Affiliation: Oak Park Unified School Dist

Subject: AB 32

Comment:

One of the best ways to reduce the state's greenhouse gas emissions and put resources towards our public schools would be to develop a program as part of AB 32 that helps schools install renewable energy projects. For example, we have had a study completed that shows that an \$8 million investment in solar would take our school nearly 100% off the grid and save us over \$500,000 a year, which would go to support education rather than paying Edison to burn fossil fuels. An idea, that I believe would be very much welcomed by the renewable energy industry and school districts would be for the state to provide matching funds for solar projects. It would make them affordable and have a huge impact on our budgets and the state's carbon footprint.

Our school district is the first National Green Ribbon School District in California and a leader in environmental education and practice. I have presented many aspects of this at a variety of conferences. I would be willing to meet or confer with anyone to discuss these ideas further.

Dr. Tony Knight  
Superintendent  
Oak Park Unified School District  
Oak Park, CA Ventura County 91377

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-12-14 12:38:06

No Duplicates.

**Comment 133 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Katherine

Last Name: Luke

Email Address: katherine.luke@berkeley.edu

Affiliation: UC Berkeley Donald Vial Center

Subject: UC Berkeley Donald Vial Center Comments on Second Investment Plan

Comment:

Please see attached file for full text of comment on the revised draft Second Investment Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/146-investplan2-ws-VDBXJwNhVloCZwRr.pdf>

Original File Name: DVC comments on second investment plan 12.14.15.pdf

Date and Time Comment Was Submitted: 2015-12-14 13:26:07

No Duplicates.

**Comment 134 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Ian

Last Name: Padilla

Email Address: [ipadilla@m-w-h.com](mailto:ipadilla@m-w-h.com)

Affiliation: Coalition for Adequate School Housing

Subject: AB32 Cap-and-Trade Funding for Schools

Comment:

Please see the attached letter.

Sincerely,

Ian Padilla

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/147-investplan2-ws-BWQCdgFiVFgBZlc1.pdf>

Original File Name: ARB\_AB32\_CASH.pdf

Date and Time Comment Was Submitted: 2015-12-14 15:04:18

No Duplicates.

## **Comment 135 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Deborah

Last Name: Moore

Email Address: [deborah@greenschools.net](mailto:deborah@greenschools.net)

Affiliation: Green Schools Initiative

Subject: AB32 investments in Sustainable Schools

Comment:

On behalf of the 27 under-signed organizations and individuals, Green Schools Initiative welcomes the opportunity to submit comments on the Final Draft Cap-and Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19. Collectively, our organizations represent more than 1.6 million parents, students, facility directors, school board members, school district administrators, environmental educators, and health and environmental organizations, and nearly all 1,000 school districts and county offices of education in California. We advocate for K-12 public schools in California and are dedicated to ensuring that schools are community models of sustainability that contribute to achieving greenhouse gas reduction goals and that provide healthy, safe learning environments for all California students. Climate change is a children's issue: children are more vulnerable to heat-related illnesses, air pollution and asthma, and lack of access to safe outdoor spaces to play and learn.

We commend and thank the Air Resources Board for responding to public comments to include K-12 schools in the Investment Plan. We support the revisions in the Final Draft Investment Plan that include schools as "Potential Recipients" for "Draft Investment Concepts" for numerous topics under the three primary over-arching priorities of Transportation & Sustainable Communities, Clean Energy & Energy Efficiency, and Natural Resources & Waste Diversion. We also support the inclusion of schools within the Potential Cross-Cutting Approaches for Local Climate Action in Disadvantaged Communities (pp. 29-30), and Efficient Financing Mechanisms to Maximize Investment (p. 30-31). We appreciate the ARB's recognition that "Sustainable Schools" are an important component of "Sustainable Communities" as evidenced by the Final Draft Investment Plan's inclusion of schools in these areas.

While we support these changes, we also suggest some additional revisions that would better enable K-12 schools - especially those in disadvantaged communities - to access and utilize grants supported by the Greenhouse Gas Reduction Fund for projects that can produce results in the short-, medium- and long-terms. Our additional comments are detailed in the attached letter. Thank you for your consideration and for including schools in the Investment Plan priorities.

Sincerely,

Deborah Moore

Green Schools Initiative

On behalf of 26 additional endorsing organizations

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/148-investplan2-ws-WzxcPQBzBzIGXwBm.pdf>

Original File Name: GGRF Final Draft Investment Plan Ltr Sustainable Schools 12-14-15 (Final).pdf

Date and Time Comment Was Submitted: 2015-12-14 15:33:49

No Duplicates.

**Comment 136 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Tom

Last Name: Torlakson

Email Address: ltaylor@cde.ca.gov

Affiliation: State Supt. of Public Instruction

Subject: Comments on Revised Draft Second Investment Plan

Comment:

Please see attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/149-investplan2-ws-BmVcPIYyVVIQNVM8.pdf>

Original File Name: CDE Comments on Revised Second Investment Plan 12-14-15.pdf

Date and Time Comment Was Submitted: 2015-12-14 15:28:41

No Duplicates.



## **Comment 137 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Deborah

Last Name: Moore

Email Address: [deborah@greenschools.net](mailto:deborah@greenschools.net)

Affiliation: Green Schools Initiative

Subject: AB32 investments in Sustainable Schools

Comment:

On behalf of the 28 under-signed organizations and individuals, Green Schools Initiative welcomes the opportunity to submit comments on the Final Draft Cap-and Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19. Collectively, our organizations represent more than 1.6 million parents, students, facility directors, school board members, school district administrators, environmental educators, and health and environmental organizations, and nearly all 1,000 school districts and county offices of education in California. We advocate for K-12 public schools in California and are dedicated to ensuring that schools are community models of sustainability that contribute to achieving greenhouse gas reduction goals and that provide healthy, safe learning environments for all California students. Climate change is a children's issue: children are more vulnerable to heat-related illnesses, air pollution and asthma, and lack of access to safe outdoor spaces to play and learn.

We commend and thank the Air Resources Board for responding to public comments to include K-12 schools in the Investment Plan. We support the revisions in the Final Draft Investment Plan that include schools as "Potential Recipients" for "Draft Investment Concepts" for numerous topics under the three primary over-arching priorities of Transportation & Sustainable Communities, Clean Energy & Energy Efficiency, and Natural Resources & Waste Diversion. We also support the inclusion of schools within the Potential Cross-Cutting Approaches for Local Climate Action in Disadvantaged Communities (pp. 29-30), and Efficient Financing Mechanisms to Maximize Investment (p. 30-31). We appreciate the ARB's recognition that "Sustainable Schools" are an important component of "Sustainable Communities" as evidenced by the Final Draft Investment Plan's inclusion of schools in these areas.

While we support these changes, we also suggest some additional revisions that would better enable K-12 schools - especially those in disadvantaged communities - to access and utilize grants supported by the Greenhouse Gas Reduction Fund for projects that can produce results in the short-, medium- and long-terms. Our additional comments are detailed in the attached letter. Thank you for your consideration and for including schools in the Investment Plan priorities.

Sincerely,

Deborah Moore

Green Schools Initiative

On behalf of 27 additional endorsing organizations

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/150-investplan2-ws-UDcCY1wvVWBXDII0.pdf>

Original File Name: GGRF Final Draft Investment Plan Ltr Sustainable Schools 12-14-15 (Final).pdf

Date and Time Comment Was Submitted: 2015-12-14 15:38:46

No Duplicates.

**Comment 138 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Cathleen

Last Name: Pieroni

Email Address: CPieroni@sandiego.gov

Affiliation:

Subject: ARB Second Investment Plan Comment Letter

Comment:

Please see attached comment letter.

Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/151-investplan2-ws-UDFVIVEyVVkBYQdu.pdf>

Original File Name: ARB Final 2nd Investment Plan comments Dec 2015 cp.pdf

Date and Time Comment Was Submitted: 2015-12-14 15:45:25

No Duplicates.

**Comment 139 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Liz

Last Name: Whiteley

Email Address: liz.whiteley@nasrc.org

Affiliation: North American Sustainable Refrigeration

Subject: NASRC Comments on Investment Plan

Comment:

Please see attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/152-investplan2-ws-VzlUM1QmVncAZVQL.pdf>

Original File Name: NASRC\_comments\_2nd-Investment-Plan\_12-14-15.pdf

Date and Time Comment Was Submitted: 2015-12-14 16:22:26

No Duplicates.

**Comment 140 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Kaylon

Last Name: Hammond

Email Address: khammond@leadershipcounsel.org

Affiliation: Leadership Counsel

Subject: 2nd Investment Plan Revised Draft Comment Letter

Comment:

See attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/153-investplan2-ws-VWdUPFE0VFgLZAFv.pdf>

Original File Name: 2nd Investment Plan Revised Draft Comment Letter.pdf

Date and Time Comment Was Submitted: 2015-12-14 16:34:22

No Duplicates.

**Comment 141 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: Kerri

Last Name: Timmer

Email Address: ktimmer@sierrabusiness.org

Affiliation: Sierra Business Council

Subject: SBC Comments on Revised Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Comment:

Please accept the attached comment letter regarding the Revised Draft C&T Auction Proceeds Second Investment Plan to be discussed by the Board at its Dec. 17 meeting.

Thank you,  
Kerri Timmer  
Government Affairs Director  
Sierra Business Council

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/154-investplan2-ws-WilWMIU3VVkKb1U0.pdf>

Original File Name: SBC CAMP\_CARB Second Investment Plan Comments\_2015\_12\_14.pdf

Date and Time Comment Was Submitted: 2015-12-14 16:34:27

No Duplicates.

## **Comment 142 for Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) - 1st Workshop.**

First Name: David

Last Name: Levitus

Email Address: david.levitus@gmail.com

Affiliation: Climate Cents

Subject: Crowdsourcing and crowdfunding platform

Comment:

It could be very useful to have tool to engage the public in GHG reduction projects.

Work with nonprofits to develop a digital platform that enables this in a compelling way.

Facilitates community ideas rising up, projects getting some community funding. Use that to leverage govt and private funding, attract attention, gauge community interest and gin it up. Target disadvantaged communities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2015-12-14 16:58:47

No Duplicates.

**There are no comments posted to Public Input on Cap-and-Trade Auction Proceeds Second Investment Plan (investplan2-ws) that were presented during the Workshop at this time.**