



November 13, 2015

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

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

Dear Chairperson Nichols,

The Capital Region Climate Readiness Collaborative (CRC) would like to thank you for ARB's hard work to make the Cap-and-Trade Auction Proceeds Second Investment Plan possible and applaud you for the bold vision put forward.

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).

The Capital Region Climate Readiness Collaborative would like to offer the following comments about the plan.

- **We Applaud the Longer-Term Vision of the State** – We applaud the longer-term vision the State has taken and the recognition that achieving the Governor's goals will require “accelerating current programs and projects as well as pursuing additional innovative strategies across sectors—all while providing the opportunity for California to adapt to the impacts of climate change and delivering a multitude of other tangible benefits to Californians.”
- **Prioritize Climate Ready Projects that have Long Term Benefits and Improve Resiliency** – The State should prioritize projects that consider current and future climate impacts and that will have long-term benefits. Climate-smart investments increase our readiness and resilience and ensure we are investing our limited funds wisely for current and future benefit.
- **Prioritize Cross-Sectoral Projects with Co-Benefits** – Today, cross-sectoral public projects (for example those that result in both energy and water savings) are not the norm, and resource-specific organizations that pursue them often experience project delays and other challenges. To achieve long-term success as efficiently as possible, the State should prioritize projects that work across sectors on multiple scales, realize multiple benefits (not just single needs or single processes), and those that combine mitigation with adaptation activities.
- **Allow for Integrated Projects throughout California** – We fully agree about the need to “support local transformation through climate action in disadvantaged communities” and would welcome a program that allows for “integrated projects.” However we see no reason the benefits of integrated projects should be limited to disadvantaged communities. Throughout California, “Community residents or local



governments with jurisdictions” are “well positioned to identify projects that reduce GHG emissions to meet local needs and support community-wide transformation.” Empowering local government “conveners” in any community is going to help identify the best projects with the greatest chance for significant reductions.

- **Support Projects that Benefit the Urban-Rural Connection** – Urban regions – and all the communities within them - greatly benefit from healthy forests and watersheds but this is not often recognized when funding decisions are made. We would like to emphasize the importance of the urban-rural connection and encourage you to support projects that benefit the urban-rural connection. A research program to summarize available data and document the methods by which these economic and environmental connections can be effectively demonstrated would be helpful for long-term program development and prioritization.
- **Address the Urban Bias in CalEnviroScreen** – We are glad to see the mention of a need and possible approach to supporting rural communities who – by virtue of their resource base – are a critical part of California’s climate response, but are extremely limited in their capacity to participate. CalEnviroScreen’s current methodology to identify disadvantaged communities overlooks socioeconomically disadvantaged rural communities, as its environmental burden indicators are geared toward identifying urban hazards (ex. traffic, hazardous waste, toxic releases, cleanup sites). We hope that this can be taken into consideration when applications from rural communities are received and that the proposed rural program can address the current imbalance.
- **Connect with Local and Regional Projects, Initiatives and Collaboratives** – To assist the State in implementing the Cap-and-Trade Auction Proceeds Second Investment Plan, the State must connect with local and regional projects and initiatives. Existing regional organizations, such as CRC and our colleagues from the Alliance of Regional Collaboratives for Climate Adaptation (ARCCA) – the Bay Area Climate and Resiliency Project, the Los Angeles Regional Collaborative, the San Diego Climate Collaborative, and the Sierra Climate Adaptation and Mitigation Partnership – are key players in their respective localities, providing guidance to decision-makers and helping to organize and streamline climate action. As state agencies move forward on implementing the Second Investment Plan we encourage you to work with these and other regional entities to better connect with local governments and agencies and prioritize the work according to their input and local knowledge.

The CRC would like to express its commitment to working with the State to prepare for climate change impacts at the regional and local level and would like to thank you again for the opportunity to provide comments on the Cap-and-Trade Auction Proceeds Draft Second Investment Plan. We welcome any questions you might have.

Sincerely,

Larry Greene
Steering Committee Chair
Capital Region Climate Readiness Collaborative