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May 15, 2018

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

Re: 2017 Climate Change Scoping Plan Update

Dear Chair Nichols:

Thank you for the opportunity to review the 2018 Draft Revised Funding Guidelines for Agencies that Administer California Climate Investments (Draft 2018 Funding Guidelines). Overall we are heartened to see that CARB is providing ways for agencies to meet statutory requirements to facilitate reductions in GHGs while also providing opportunities for agencies to fund outreach, technical assistance, climate research, and adaptation planning. These project types are critical to the long-term facilitation of GHG reductions, particularly in communities most impacted by climate change.

For over 40 years, The Trust for Public Land (TPL) has conserved land for people to enjoy as parks, gardens, and other natural places; and built parks and other nature-based infrastructure in our urban environment, ensuring equitable and livable communities for generations to come. As California quickly pivots from fossil fuels towards a more sustainable future, TPL works to make communities more resilient, ensuring that inequities are addressed and quality-of-life is improved for disadvantaged communities in the new California economy. Our comments are limited to the following:

Guiding Principles

III.C.1 Facilitate GHG emission reductions (p.9): We suggest an addition to the sentence in the second paragraph as follows- "A program comprises individual projects and may include multiple project types, technical assistance and outreach to applicants, coordinated research, *planning*, and other implementation activities to more completely address the kinds of projects that can lead to long-term facilitation of GHG reductions.

III.C.2. Target investments in and benefiting priority populations, with a focus on maximizing disadvantaged community benefits (p.10):

Suggest adding a final sentence that states: "Funded project activities can include community engagement, organizing, and outreach at both the program and project level for projects that benefit priority populations."

III.C.6: Coordinate investments and leverage funds where possible to provide multiple benefits (p.13): Overall, we are pleased to see encouragement to coordinate investments. We believe that coordinating

investments through the creation of programs like the Transformative Climate Communities (TCC) program should be encouraged. With this in mind, we suggest addition that “CARB will encourage and support coordination across agencies to combine funding or create combined funding programs through its consultation and outreach efforts.”

IV. A. 5. Conduct public outreach and encourage community engagement...(p.23)

We are heartened to see CARB’s continued emphasis on creating consistent and robust public outreach and engagement by agencies implementing CCI programs. We would encourage additional emphasis on technical assistance provided by agencies to community organizations and local government entities in order for communities to develop projects, write grant applications, and successfully implement and report on climate mitigation and adaptation projects.

V. A.1. Priority population program targets (p.34). We believe that GGRF funds should be invested to benefit residents of low-income and disadvantaged communities with less separation between the minimum thresholds to provide more flexibility to agencies managing programs with significant funding needs in rural low-income areas. Many of the natural resources our state depends on for climate change adaptation such as watersheds and forests are located in or near low income rural communities. We encourage a shift to requiring a certain percentage of funding go to projects that benefit priority populations without set, separate minimums for disadvantaged, low-income, and low-income buffer communities.

V.A.2. Other statutory investment requirements (p.35) Overall, the shift to describing priority populations (which includes residents of disadvantaged, low-income, or low-income and buffer communities), leads us to believe that programs should use a term other than “disadvantaged communities” to describe those priority populations. For example, the Urban Greening Grant Program allocates at least 75% to projects that are located in, and provide benefits to *priority populations*, correct?

Table 5. Examples of Common Needs of Priority Populations (p. 42)

Under Public Health #2 we encourage the addition of language to specify that “playgrounds” reduce health harms and under Public Health #4 we encourage the addition of “splash pads” as a specific element within parks that can reduce-heat related illnesses and increase thermal comfort of priority populations.

Thank you again for the opportunity to comment on the Draft 2018 Funding Guidelines. Please don’t hesitate to let us know how we can be helpful.

Sincerely,



Mary Creasman

California Director of Government Affairs
The Trust for Public Land