August 28, 2015

Mary Nichols, Chair

California Air Resources Board

1001 I Street

Sacramento, CA 95814

Dear Ms. Nichols:

Thank you for the opportunity to submit comments to your agency on the Cap-and-Trade Auction Second Investment Plan (FY 2016-17-2018-19). As a state agency, the Rivers and Mountains Conservancy is deeply committed to the reduction of greenhouse gases and funding projects that are consistent with our mission to provide equitable access to provide open space, recreational opportunities, educational activities and watershed improvements within our territory.

The RMC is one of 10 conservancies throughout the state that funds local, state(?) and nongovernmental organizations for parks and open space projects throughout our territory. Our catchment area includes a highly urbanized and densely populated area of approximately 4.8 million residents. Of this amount, approximately 1.86 million residents live in a disadvantaged community according to the CalEnviro Screen maps. Since its founding in 1999, the RMC has been able to complete over 200 projects including park development, trail design and construction, land acquisitions, and a wide-range of studies and planning efforts resulting in the creation of 3,544 new acres of parkland throughout our watersheds.

We have reviewed the Draft Concepts for Public Discussion regarding the Cap-and-Trade Auction Proceeds and have the following comments:

**Comments on the Draft Concept Paper for the Cap-and-Trade Auction Proceeds:**

**Transportation and Sustainable Communities**

**This section should also include funding for other alternative modes of transportation, including bike and pedestrian trails, specifically those that connect communities with active and passive recreational trails**. Within our territory, there are various regional and community trails including the San Gabriel River Bike Trail (Class 1), LA River Bike Trail (Class 1), Rio Hondo Bike Trail, Coyote Creek, San Jose Creek, Carbon Creek, Avocado Creek, just to name a few. These kinds of passage ways have long been very popular and used by many. They are also becoming much more popular not only as impactful regional trails, but also those that are being included as part of cities’ Master Plans and other planning documents.

When planned well and implemented, these trails provide significant health and sequestration benefits, especially when urban greening (tree planting) and native landscaping are incorporated.

While many are considered recreational trails, they also serve as modes of transportation and short distance commutes for users going to jobs, schools, shopping and other destinations. We highly recommend that these recreational trails be included as something that can be funded as part of the Transportation and Sustainable Communities Program.

One recent example is the Compton Creek Urban Trail located in the Willowbrook community of the City of Compton. Using a variety of funds including a $415,000 grant from the RMC to the Los Angeles Conservation Corps, 2 blocks of decomposed granite trail was created including a rip rap swale that functions as a water quality improvement and also captures debris and treats run off before it enters the Creek. Riparian grasses and irrigation along the Creek right of way, under jurisdiction of LA County Flood Control District, support local habitat with food and nesting areas and serve as cover vegetation. These improvements are located adjacent to Washington Carver County Park which also has a walking trail as part of the project.

These improvements not only enhance the aesthetics of the Creek to encourage pedestrian use and enhanced opportunities for physical activity, they also contribute to the overall improvement of the visual character of the neighborhood and provide shade areas along the Creek by adding large

climate appropriate trees along the two-block distance of the Creek from 118th street to 120th

Street. The majority of the work was done by the LACC in coordination with the LA County Department of Parks and Recreation. While the scale of this project size is relatively small, it is also an example of an **Integrated Project** that supports **Local Climate Action** located in a **Disadvantaged Community** that addresses transportation through the urban trail, urban forestry, water quality improvement, and opportunities for physical activity – all in one community and through one project.

**Local Conservancies & Disadvantaged Communities**

**As a local Southern California Conservancy that serves an urban population, the RMC can function as the local administering agency that can assist with providing technical assistance to cities and NGO’s with the grant writing process for Cap-and-Trade proceeds.** There can also be an educational component to educate applicants about greenhouse gas reduction and carbon sequestration and similar concepts. These are highly technical terms that many people may shy away from because they are not familiar enough with them. The requirements regarding measurements for reducing greenhouse gas and carbon emissions and sequestrations require a specialized field of analysis. There has been much discussion about the need for technical assistance. However, this goes beyond merely informing applicants as to the method of going about applying for the funds. There is a need to actually educate and even provide up front grants or stipends for those smaller cities and NGO’s who don’t have the staff or capacity to apply for these grants. We recommend using the RMC as the local, hands-on Conservancy that can provide this technical assistance and small grants/stipends(?), using the administrative funding available through the Cap-and-Trade program. This can be set up as a pilot demonstration program and measurements of success can be evaluated by the number of cities or NGO’s that take advantage of the program, actual grants submitted and/or funded, or other measurements demonstrating success.

This type of pilot project can become a permanent program and will help as an additional way to provide information and assistance to cities and NGO’s that are located within or serve a disadvantaged community, further helping to carry out the required mandates of the Cap-and-Trade program.

Thank you for the opportunity to provide these comments. We look forward to receiving any updates on these revisions. If you have any questions or would like to discuss the recommendations, please contact Marybeth Vergara, Project Analyst at [mvergara@rmc.ca.gov](mailto:mvergara@rmc.ca.gov) or 626-815-1019 x111. You can also contact me at [mstanley@rmc.ca.gov](mailto:mstanley@rmc.ca.gov).

Sincerely,



Mark Stanley,

Executive Officer