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September 14, 2017

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

Re: 2017 Funding Guidelines for Agencies that Administer California Climate Investments

Dear Chair Nichols:

Thank you for the opportunity to review the 2017 Funding Guidelines for Agencies that Administer California Climate Investments (CCI), revising the 2015 Funding Guidelines and the 2016 supplement. Overall, we are pleased to see the updates reflect the legislative requirements of AB 1550 (Gomez, 2016) and the inclusion of SB 824 (Low Carbon Transit Operations Program, Beall, 2016), and AB 2722 (Transformative Climate Community Program, Burke, 2016). We commend CARB for your continued work to ensure that climate investments benefit disadvantaged communities, low income communities, and low income households. 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. We have very few comments, outlined below:

Encourage Technical Assistance Opportunities within Every CCI

Program: We are pleased to see the emphasis on encouraging meaningful engagement with communities. Investments must be community-driven, and community leadership and decision-making power must be integrated into the implementation of SB 535 and AB 1550. We would like to see more programs provide technical assistance opportunities to community organizations and government entities in order for them to participate meaningfully in State climate investment programs. Technical assistance should include resource, leadership, and partnership development in disadvantaged communities, leveraging existing programs and partnerships to accomplish climate resiliency goals at the local level. We also support the inclusion of mechanisms to simplify and streamline the process of accessing funding. Finally, we hope that the technical assistance can extend to project tracking and reporting GHG emission reductions, co-benefits, and other information.

Volume 2: Approach to Evaluate Investments and Meet AB 1550 Investment Minimums (p.2-13):

Regarding maximizing benefits to disadvantaged communities per SB 535, under e) we would encourage that agencies partner with local Community Based Organizations (CBOs) to conduct outreach in or near disadvantaged communities and suggest a change in the first bullet to reflect this emphasis on outreach conducted with local partners, which would bring it in line with V.F.3 a) “Publicly designated staff for program outreach and partnership development with and between community groups.”

Augment Community Outreach by attending existing community events (V.F.3. Outreach p. 2-19). We commend the emphasis on conducting community outreach in the Draft Funding Guidelines but would augment outreach around event hosting with outreach that focuses on information distribution at existing community events such as tabling or conducting surveys at community events.

Anti-Displacement Goals: As investments to benefit disadvantaged communities increases through the implementation of AB 1550, agencies must work to ensure that projects do not result in the displacement of local residents, businesses, and people of color. Strategies to ensure that long-time residents can stay in place as neighborhoods improve is a critical step to ensure that socially vulnerable populations don’t get priced out after climate investments take place. We are pleased to see the potential prioritization of projects in jurisdictions with anti-displacement policies listed in Table 2-2 and V.F.2.

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

Sincerely,

A handwritten signature in cursive script that reads "Mary Creasman". The signature is written in black ink and has a long, sweeping tail that extends to the right.

Mary Creasman

California Director of Government Affairs
The Trust for Public Land