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[www.cityofwestsacramento.org](http://www.cityofwestsacramento.org)

June 29, 2015

Air Resources Board  
California Environmental Protection Agency  
1001 I Street  
Sacramento, CA 95812

Via: <http://www.arb.ca.gov>

RE: Draft Cap-and-Trade Auction Proceeds Funding Guidelines

Dear Cap-and-Trade Representative:

The City of West Sacramento is pleased to respond to the request for comments on draft guidelines for administration of Cap-and-Trade grant programs.

During the initial round of Affordable Housing and Sustainable Communities (AHSC) funding, many eligible transportation-related projects could not meet the environmental review requirements in the Notice of Funding Availability (NOFA). AHSC required that the California Environmental Quality Act (CEQA) and any applicable federal National Environmental Protection Act (NEPA) reviews be completed and all challenge periods be expired prior to submission of an application for funding. This is standard procedure for housing projects that require case-by-case NEPA and CEQA review. These projects can be held up for years if there are challenges to the NEPA or CEQA determinations. But transportation projects are not usually handled in this manner. They are normally covered under a General Plan or other large Environmental Impact Report/Environmental Impact Statement.

Normal Caltrans procedure allows for final environmental review to be completed as a part of the project and may be paid with the grant funds, rather than requiring that it be completed at the cost of the jurisdiction prior to application for funding. This is particularly critical to Disadvantaged Communities that may not have the capacity or resources available to conduct environmental reviews for projects that are not assured of funding. This issue likely contributes to the disparity between the location of the vast majority of Disadvantaged Community census tracts on the CalEnviroScreen 2.0 map and the location of the majority of awards on the FY 2014-15 AHSC funding recommendations map.

To facilitate development of walkable/bikeable/transit-friendly infrastructure in high density infill neighborhoods, we ask that the ARB consider adding a recommendation in the guidelines that transportation-related infrastructure be exempt from environmental review prior to the submission of a grant

application. Instead, NEPA and/or CEQA approval should become a part of the project using the Caltrans model. AHSC grant applications requesting funding for housing and transportation infrastructure should require that NEPA and/or CEQA be completed for housing and housing-related infrastructure. However, any transportation-related infrastructure, if already covered under an EIR/EIS should be allowed to complete environmental review once the funding is available.

Thank you for this opportunity to comment on the Cap-and-Trade program guidelines. Please contact Louise Collis at (916) 617-4555 if you have any questions regarding the City's position on environmental reviews.

Sincerely,



Louise Collis  
Interim Housing Manager