

September 1, 2015

California Environmental Protection Agency - Air Resources Board

Ms. Shelby Livingston, Chief

Climate Investments Branch

1001 I Street

Sacramento, CA 95814

**RE: Cap and Trade Auction Proceeds – Round two Comments on Funding Guidelines for CA Climate Investments Program**

Ms. Livingston,

The Cordova Recreation and Park District wishes to express its continued appreciation for the opportunity to comment on the Funding Guidelines for Agencies that Administer the California Climate Investments from the Cap and Trade Auction Proceeds. As the representative of Cordova Recreation and Park District, I have reviewed the draft document and would like to provide the following additional comments for your consideration.

**Please consider the inclusion of programs directly addressing Parks, Recreation and Public Open Spaces.**

As it exists, parks, recreation and public open spaces are largely attached to project budgets as a co-benefit of other larger projects such as housing, transportation, water conservation and forestry. Park improvement projects are under-represented in the GGRF and yet play a significant role in the remediation of air quality. It is our position that the Investment Plan includes programs directly relating to and funding park improvement projects.

Furthermore, as a CA Special District whose sole mandate is to provide parks and recreation services to a diverse and large regional, urban population, our focus is narrow but our impact is great. We are in the unique position to effect significant and lasting environmental improvements by leveraging potential federal partnerships and funding sources through the Sacramento Promise Zone; a rare opportunity in the state and region. Our impact on greenhouse gas reductions can be elevated by including programs directly relating to and funding park improvement projects such as trail improvement, water recycling and storm water retention, tree planting and urban agriculture.

**Please consider providing more clarity regarding the environmental review process and a framework for how to manage the unintended impacts of CEQA on the GGRF programs, particularly relating to:**

* **Funding:** The document should help direct agencies through the statutory requirements and procedures of CEQA earlier in the process as they design programs to invest GGRF dollars. Considering that grant funding may not ideally align with CEQA scope and process, this document may provide more clarity to the agencies managing these conflicts and ultimately help avoid unexpected cost overruns.
* **Project implementation/timing:** This document should provide some guidance to agencies when GGRF and environmental review deadlines are incompatible; jeopardizing both climate investment funds and time sensitive CEQA permits.
* **Agency coordination and partnerships:** The guidelines do not provide enough assurance that projects of appropriate size and scope will be funded in those most vulnerable communities. Assuming that agencies are more likely to fund shovel ready projects because they have fewer statutory/CEQA requirements, this may impede the goals of funding projects in disadvantaged areas. It is our concern that the resulting effect is a disincentive to reducing GHG emissions. Consider provide more guidance to all administering agencies on how to coordinate funding and process CEQA on proposed projects requiring more in depth environmental review. It is important to ensure that large projects with greater impacts and GHG reduction benefits may be funded in disadvantaged communities.

Again, the District appreciates the Air Resources Board’s collaborative planning efforts to the benefit of all stakeholders as well at their commitment to planning environmentally responsible, healthy and sustainable communities. We look forward to continued engagement in this project. Please don’t hesitate to contact me if you have any questions.

Regards,

Linda Roberson, Park Planner and Urban Designer

Cordova Recreation and Park District

CC: Evan Schmidt, Project Leader – Valley Vision

 Christina Lokke, Senior Legislative Representative - CSDA

 James M. Rodems, Cordova Recreation and Park District Administrator