

September 15, 2017

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: 2017 Cap-and-Trade Auction Proceeds Draft Funding Guidelines

To Whom It May Concern:

The undersigned Sierra-based land conservation, utility and community sustainability organizations are writing in support of California's rural areas and providing the resources necessary to help these areas mitigate and adapt to climate change. We appreciate the efforts of the 2017 Draft Funding Guidelines to help address the needs of low-income households and communities as they work toward a path of adapting to climate change. While the Sierra Nevada and other rural regions struggle with the effects of climate change, rural areas do not receive a proportional amount of support. At the same time, impacts of climate change are not limited just to local residents. Extreme events like severe wildfire, tree mortality, and drought also affect downstream urban communities that rely on the resources coming from forested rural parts of the state.

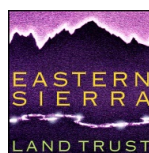
RECOMMENDATIONS

Prioritizing Climate Adaptation: The 2017 Draft Funding Guidelines should explicitly include climate adaptation benefits as a priority for administering agencies to consider when investing in projects that help achieve the State's climate goals.

Direct Additional Funds to California's Natural & Working Lands: Considering the recent cap-and-trade extension bill allows the funds to be used for a broader range of projects, new funding should be directed to projects on natural and working lands that provide multiple climate benefits. These projects should include forest management projects that will increase the carbon storage capacity of California's forests, reducing destructive wildfires and black carbon emissions.

Remove Barriers for Rural Areas: The 2017 Funding Guidelines should aim to overcome policy and statutory barriers that are keeping rural people from engaging in the state's climate change mitigation and adaptation efforts. These barriers include using CalEnviroScreen to determine DACs, which uses a methodology that precludes many rural areas from accessing vital funding for climate adaptation efforts. Many rural areas also experience a low level of capacity and a lack of assistance to support project development and applications for GGRF programs.

Transparency for GHG Reduction Quantification Methodologies: The California Air Resources Board should include release methodology used to determine GHG reductions, including citing the studies used to make determinations and any adjustments made to applicant's calculated GHG reductions.



In closing, we want to emphasize that dedicating resources to support California's rural areas is an imperative need in order to support the State's climate mitigation and adaptation goals. Setting priorities with the 2017 Funding Guidelines will programs not only help with GHG emissions, adaptation and resiliency to climate change, but improve human health, wildlife habitat, air and water quality, food production and quality of life.

Thank you for your leadership on this critical issue, and we look forward to working with the Legislature in advancing GGRF investments in natural and working lands.

Sincerely,



Steve Frisch
President
Sierra Business Council



Marty Coleman-Hunt
Executive Director
Bear Yuba Land Trust



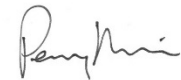
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