



September 1, 2015

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

Re: Cap-and-Trade Auction Proceeds Second Investment Plan Draft Concept Paper

Dear Ms. Nichols:

Thank you for the opportunity to comment on the Cap-and-Trade Auction Proceeds Second Investment Plan Draft Concept Paper (Concept Paper). The mission of the Los Angeles Neighborhood Land Trust (Land Trust) is to build healthier, stronger, and safer neighborhoods through the creation of urban parks and gardens in Los Angeles' low-income communities of color. As an environmental justice organization, the Land Trust is deeply committed to climate change mitigation and adaptation through multi-benefit urban greening, especially in the communities most vulnerable to climate change consequences.

Last year we submitted a concept proposal to CALFIRE's Urban and Community Forestry Program funded by the Greenhouse Gas Reduction Fund (GGRF). Our project is the Coronado Nature Park and Community Garden, located in Westlake, one of LA's most densely populated and park-poor neighborhoods. The project will transform a vacant blighted lot, less than 1/3 of an acre, into a 23-tree urban forest, with a healthy food growing area, walking paths, and California-native, drought-tolerant vegetation. We were invited back to submit a project application, but unfortunately, we were not awarded a grant. The state urban forester told us that we had a great project that provided great benefits for the cost, but the grant program was way oversubscribed and our project did not provide sufficient greenhouse gas (GHG) reductions according to the only accepted GHG reduction methodology for this program, tree planting.

From this experience with first round GGRF grant funding, we draw two conclusions. **First, robust investment in urban greening in disadvantaged communities must be a top priority.** Our urban greening projects may not cover a lot of acreage, but we cover a lot of people (for instance, 38,000 people live within a half mile of the project described above). Green spaces in the highly dense, highly built urban core will not only sequester greenhouse gases, but also offer untold environmental, economic, social, and public health co-benefits.

Second, urban greening goes beyond urban forestry. Trees are a vital source of GHG reductions, but beyond forestry, we strongly recommend that ARB incorporate GHG reduction methodologies that implement the best management practices of water, vegetation, and soil, and that reduce vehicle miles traveled and food miles. We are highly encouraged by the inclusion of healthy soils practices and organic waste diversion in the Concept Paper, and we urge these investments not just on large-scale rural farms, but on small-scale urban farms, especially those in disadvantaged communities.

Finally, the Concept Paper stresses that disadvantaged communities should be able to compete themselves for GGRF funds (III.B, p.4). Currently many GGRF programs are not set up to be user-friendly



for communities with fewer resources, less capacity, or experience in applying for highly competitive public funds. **Therefore, we strongly suggest that technical assistance be provided early in the process in order to assist applicants in making their projects more competitive.** This includes technical support for the required GHG calculations, which will encourage broad participation in the program and help ARB and implementing agencies ensure consistency with GHG quantification. Furthermore, we recommend the following:

- Bonus points for applications that demonstrate a multiple-benefits strategy;
- Incentives for grant applicants to directly engage members of disadvantaged communities in project selection, design, and prioritization;
- Funding through set-asides within GGRF programs for planning, decision-making tools, and community engagement, with the intent that the planning would lead to projects resulting in GHG reduction;
- Matching funds requirements waived for projects located within disadvantaged communities;
- Grant eligibility for nonprofit organizations in order to increase the variety of projects that are brought forward and to encourage a greater diversity of partnerships.

Thank you, again, for the opportunity to provide comments on the Concept Paper. The Land Trust looks forward to reviewing the full draft Investment Plan when it is released later this year. If you have any questions or would like to discuss the recommendations made in this letter, please contact Elsa Tung, Policy and Research Manager, at etung@lanlt.org or (213) 797-6559.

Sincerely,

A handwritten signature in purple ink that reads "Alina Bokde".

Alina Bokde
Executive Director