**Comments from LARiverWorks, Office of Los Angeles Mayor Eric Garcetti**

**on ARB’s Cap-and-Trade Auction Proceeds Funding Guidelines for Agencies that Administer California Climate Investments**

**I. Priority Projects**

Appendix 1.A lists project categories and types of projects that will be eligible for funding. We understand this list is not meant to be exhaustive, but we would like to **recommend project types** that will have immense benefits and should be prioritized or scored more favorably:

1. Prioritize projects that are included within legislatively adopted plans

* Encourage agencies that administer California climate investments to prioritize funding for projects that are included within one, but preferably two or more legislatively adopted plans
* This could be incorporated into Volume 1: Process for selecting projects for funding

2. Prioritize projects that are regionally significant

* Encourage agencies to prioritize funding for transit projects that are part of a regional network and that are considered *regionally significant*

3. Increase the public access distance to projects

* Modify guiding criteria to include projects that can be accessed by combining walking with non-motorized transportation modes at distances greater than a ½ mile. This would be more inclusive to disadvantaged populations that use bicycle pathways (and greenways) to access project sites.

4. Prioritize projects that promote increased safety

* Encourage agencies to prioritize funding for projects that, in addition to promoting low carbon transportation, also increase the safety of disadvantaged and/or vulnerable populations. This may include projects that promote safer circulation for the elderly, mobility impaired, very young, vision impaired, etc.

**II. Increase Investment located within Disadvantaged Communities (DACs)**

Disadvantaged communities are disproportionately burdened by GHG impacts. Per SB 535 (De Leon), one quarter of the Cap-and-Trade proceeds must benefit DACs but only 10% of the funds must be located within DACs. The City of Los Angeles contains 26% of the State’s share of disadvantaged communities, and is disproportionately impacted by greenhouse gases compared to other regions in the State. Reducing the impact that GHGs have on the most disadvantaged communities will benefit all by ensuring that differences are made within our key target areas.

**Recommendations:**

1. We urge a minimum of 35% of GGRF funds to be invested directly within disadvantaged communities.
2. In Guidance on Maximizing Benefits to Disadvantaged Communities, there are few Environmental examples of Common Needs of Disadvantaged Communities. According to recent planning efforts in the City of Los Angeles, we offer these additional needs faced by local disadvantaged communities:

* Improve access to multi-benefit parks that have watershed and environmental function, but also help create safe and attractive places for communities to be active.
* Improve access to greenways that create regional systems of safe, active and carbon-free transportation trails.

**III. Natural Resources – Wetlands and Watershed Restoration**

We appreciate the $40 Million increase (Vol. 2, Chp IV, page8) in Wetlands and Watershed Restoration; however, only 10% ($7M) to be awarded to a DAC census tract and another 10% ($7M) to be awarded to projects serving a DAC will not be enough. Wetland and Watershed Restoration projects that will benefit disadvantaged communities are more likely to be located in California’s cities where land prices are high and remediation costs will also be required. Along the Los Angeles River there are huge opportunities for real wetland restoration projects to benefit disadvantage census tracts, to be regional projects that serve disadvantage census tracts and to create functioning habitat, restore watershed health and create local water supplies. Planned Los Angeles River projects will a have tremendous impacts. Moreover, the Los Angeles River can leverage state dollars with federal resources due its inclusion in the Urban Waters Federal Partnership and alignment with America’s Great Outdoors initiative. The Los Angeles River within the City is currently in the process of being certified as a national historic trail with the National Park Service and may be added to the Santa Monica Mountains National Recreation Area.

**Recommendations:**

1. We recommend ARB and Governor Jerry Brown consider the benefits wetlands and watershed restoration projects bring to urban areas and to increase DAC funding from 10% to 35% for the Water Action Plan: Wetlands and Watershed Restoration (DFW) Program.
2. Urban wetlands should only be funded if they are supported by non-potable water sources.
3. To encourage the implementation of active transportation routes and greenways that have land preservation or restoration functions or lead to preserved land, wetlands, or restored land, Table 2.A-6, Step 1, A. could be amended to say:
4. “Project preserves a site that allows public access and is accessible by walking within ½ mile *or by bicycling within 2 miles* of a disadvantaged community; or”
5. With flood risk management relating to expensive regulatory and liability issues, we suggest Table 2.A-6, Step 1, B be amended to say:
6. “Project *contributes to* flood *protection* to one or more adjacent disadvantaged communities; or”

**IV. Affordable Housing and Sustainable Communities Projects – Criteria to Evaluate Disadvantaged Community Benefits**

In order to build balanced and sustainable communities, this project category needs to include urban greening elements to truly be sustainable, such elements include:

* Greenways
* River Parkways
* Multi-benefit open spaces
* Shade trees to mitigate urban heat island effect and decrease energy use in buildings.
* Stormwater management, capture and infiltration BMPs
* Water conserving landscapes
* Carbon sequestering landscape
* Etc..

It’s cumbersome for project developers to fund each component of a project with different sources of funding. The advantage of this category is that it has the potential to streamline and therefore quicken and make cost-effective the implementation of inter-disciplinary, multi-benefit holistic projects.

**Recommendations:**

1. Amend the definition of Affordable Housing and Sustainable Communities Projects in Table 2.A-3 (Appendix 2.A, page 2.A-10) to: “Projects will achieve GHG reductions by reducing vehicle miles travelled (e.g., increasing accessibility of housing, employment centers, and key destinations via complete streets*, greenways,* and/or low-carbon transportation options such as walking, biking, and transit) and *through net increases in carbon sequestration and reduced energy use as a result of urban greening.”*
2. Table 2.A-3, Step 1, A. could be amended to say:
3. “A majority (50%+) of the project is within one or more disadvantaged communities and reduces vehicle miles travelled, *increases urban greening* and the project is designed to avoid displacement of disadvantaged community residents and businesses.”
4. To encourage the implementation of active transportation routes and greenways, Table 2.A-3, Step 1, A. could be amended to say:
5. “Project is accessible by walking within ½ mile *or by bicycling within 2 miles* of a disadvantaged community and reduces vehicles miles travelled, and is designed to avoid displacement of disadvantaged community residents and businesses; or”

**V. Urban Forestry and Urban Greening – Criteria to Evaluate Disadvantaged Community Benefits**

**Recommendations:**

1. The definition of Urban Forestry and Urban Greening in Table 2.A-7 acknowledges that trees and related vegetation increases carbon sequestration. To reiterate that, we recommend amending Table 2.A-7, Step 1, A. to say:
2. “The majority of trees *and vegetation* planted by the project are in a publically accessible area within a disadvantaged community and the project terms provide for maintenance of the trees and related vegetation.”
3. To encourage the implementation of active transportation routes and greenways that have urban forestry and urban greening elements, Table 2.A-7, Step 1, A. could be amended to say:
4. “The majority of trees planted by the project are accessible by walking within ½ mile *or by bicycling within 2 miles* of a disadvantaged community and the project terms provide for maintenance of the trees and related vegetation; or”
5. With flood risk management relating to expensive regulatory and liability issues, we suggest amending Table 2.A-7, Step 1, B to say:
6. “Project *contributes to* flood *protection* to one or more adjacent disadvantaged communities; or”

**VI. Assistance with Monitoring Costs**

Because there isn’t consensus about greenhouse gas quantification methodologies, it’s currently difficult to assess the costs required for the ongoing monitoring that is required by the GGRF.

**Recommendation:**

In order to incentivize projects using greenhouse gas reduction funds (GGRF), we recommend paying for a percentage of the required monitoring. Monitoring is a way for the state to track progress on its goals to reduce greenhouse gasses to 40% below 1990 levels by 2030, but it’s also a way to facilitate the achievement of reductions by systematically cataloging which types of projects are most effectively reducing greenhouse gasses and maintaining that reduction.

* + *AB 1532. “[GGRF] moneys shall be used to facilitate the achievement of reductions of greenhouse gas emissions…” (Health and Safety Code, Section 39712 (b)).*
  + *Expenditure records need to include “A description of how a proposed expenditure will contribute to achieving and maintaining GHG emission reductions (Appendix 1.A, 1.A-2)*