



TRANSBAY JOINT POWERS AUTHORITY

Maria Ayerdi-Kaplan • Executive Director

June 29, 2015

*Via U.S. Mail and Comment Submittal Form
GGRF-GUIDELINES-WS*

Chairman Mary D. Nichols
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: Cap-and-Trade Auction Proceeds; Draft General Guidance for Agencies that Administer California Climate Investments

Dear Chairman Nichols and Members of the Board:

The Transbay Joint Powers Authority (TJPA) appreciates the opportunity to comment on the Draft General Guidance for Agencies that Administer California Climate Investments (Draft General Guidance). The TJPA remains excited by the transformative effect that cap-and-trade auction proceeds can have throughout the State, especially in California's Disadvantaged Communities. As the TJPA has previously stated, the Transbay Program is a model for transit oriented development in California that will significantly reduce greenhouse gas emissions and improve public health and quality of life throughout the Bay Area.

Last fall, the TJPA submitted comments on CARB's Draft Interim Guidance to Agencies Administering Greenhouse Gas Reduction Fund Monies. The TJPA appreciates CARB's consideration of those comments, and notes that the Draft General Guidance incorporates the TJPA's suggestion that the eligibility criteria in CARB's guidance documents include projects that are within ½ mile of a Disadvantaged Community and that also provide transit benefits and other amenities.

After reviewing the Draft General Guidance, the TJPA also recognizes that many of its previously suggested amendments remain applicable to this current guidance proposal. At the time that it suggested those amendments, the TJPA was concerned that the CARB's proposed project evaluation criteria would not credit large projects that will contribute substantial benefits to Disadvantaged Communities. In effect, the guidance would unfairly penalize such large projects. The TJPA continues to have similar concerns regarding the project evaluation criteria included in the Draft General Guidance. Thus, the TJPA is enclosing its previous comments for CARB to consider including in the final General Guidance document. The TJPA further notes that the amendments that it previously proposed to the evaluation criteria for investments in transit projects are equally applicable to the criteria for investments in affordable housing projects.

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The TJPA therefore respectfully requests that CARB amend the Draft General Guidance to better reflect the substantial benefits that large projects, such as projects within the Transbay Program, provide to Disadvantaged Communities. Please do not hesitate to contact the TJPA if we can be of any assistance as you continue to develop CARB's Draft General Guidance documents.

Very truly yours,



Maria Ayerdi-Kaplan
Executive Director
Transbay Joint Powers Authority

cc: Honorable Jerry Brown, Governor
Honorable Kevin de Leon, Senate President pro Tempore
Honorable Toni Atkins, Assembly Speaker
Honorable Mark Leno, Senator
Honorable David Chiu, Assembly Member
Honorable Philip Ting, Assembly Member

Enclosure