

December 6, 2016

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

RE: Funding Guidelines Supplement for FY 2016-17 Funds – The Trust for Public Land’s Comments

Dear Honorable Mary Nichols,

Thank you for creating the opportunity for public comment on the funding guidelines supplement for FY 2016-17 for agencies that administer California climate investments. The Trust for Public Land would like to provide brief comments on this guiding document, specifically related to the estimated minimums to benefit disadvantaged communities (DAC) for the new Urban Greening and Transformative Climate Communities (TCC) programs. The Trust for Public Land has worked for over 40 years to create a healthy and climate-smart California with access to nature for all.

Urban Greening Program (CNRA)

As stated in Table 2, 75% of Urban Greening Program funds must both benefit and be located within a DAC, based on SB 535. We suggest that the estimated minimum should be lowered to 65%, as the enabling legislation requires that projects be both located within and benefit DACs as defined by SB 535 and by Section 75005 of the Public Resources Code (PRC) (80% MHI or less). Moreover, 65% is still well above the new threshold for DAC investments mandated by AB 1550. Further, the statute requires that Urban Greening projects also benefit critically underserved communities (less than 3 acres of useable park space per 1,000 residents, PRC Section 5642), in desperate need of park and open space. The Urban Greening Program's enabling legislation requires additional consideration to projects that provide benefits to a critically underserved or DAC. By providing more flexibility to the program to expend funds in communities deemed disadvantaged or critically underserved using alternative approved metrics, SGC can ensure that these funds are specifically directed to locations where they are most needed. This change will also ensure regional equity of funding across California.

Transformative Climate Communities Program (SGC)

Although we support ARB’s guidance that 100% of TCC Program funds should be spent within and benefiting DACs, we suggest that the DAC definition used by the TCC program be kept consistent with the definition used by the rest of GGRF programs (top 25% according to CalEnviroScreen), within selected funding regions (SGC proposed rulemaking for TCC program, September 23, 2016).

Please contact me if you would like to discuss any of the above in greater detail. I can be reached at 415-495-4014.

Sincerely,

A handwritten signature in black ink that reads "Mary Creasman". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Mary Creasman
California Director of Government Affairs
The Trust for Public Land