**Cap-and-Trade Auction Proceeds September 4 Revised Funding Guidelines for Agencies that Administer California Climate Investments**

The Trust for Public Land (TPL) would like to thank you for creating the opportunity for public comment on the revised funding guidelines for agencies that administer California climate investments. We would like to provide brief comments on this document. Our mission is to create a healthy and climate-smart California with access to nature for all.

Overall we commend the ARB on compiling such comprehensive and detailed guidance for agencies that administer GGRF programs. We support the ARB in creating transparent program development and reporting requirements, and in holding public agency partners accountable to the ARB and to the public.

Greenhouse Gas Quantification

We strongly support your revisions to ‘quantification methods’ (p.1-16-1-19). We agree that quantification methods are evolving and dynamic. We are pleased to note your preparation of a ‘draft quantification work plan’ and that you are involving the public input for refinements. We also support the use of external contractors to leverage academic and external expertise and that they will be standardizing templates and providing project specific GHG quantification tools and calculators.

For example, we recommend that agencies be required by ARB to provide technical assistance to applicants on GHG quantification; a higher bar should be set for required technical assistance beyond emailing with ARB (Vol. 1 p. 18). We recommend that technical assistance be offered through person-to-person contact as well. We feel that many applicants may have cultural or language barriers that would be difficult to address through email. This will also support the ARB’s guiding principle of transparency in GHG quantification (p. 25).

We also support ARB’s proposed creation of co-benefit GHG quantification methods to promote the inclusion of multi-benefit projects that meet statewide climate, sustainable development, and resource protection priorities. Moreover, quantification of co-benefits should be included in project scoring for all programs. While we very much appreciate that ARB staff is aware of the importance of encouraging projects with multi-benefits, evaluating co-benefits at a qualitative level (p1-19) leaves too much for ‘interpretation’ and will ultimately not incent a multi-benefit approach as much as a ‘quantitative approach’ would. We very much appreciate that ARB notes this in the Guidelines, but providing scoring and calculation for critical co-benefits like human health, environmental and recreation will result in bigger bang for the buck.

Support for Disadvantaged Communities

We applaud that ARB encourage granting agencies to incentivize applicants to directly engage members of the community within a potential project area in project selection, design, and prioritization, to ensure projects in disadvantaged communities are designed in collaboration with the communities they will serve. (p. 2-11 V.B. 2) We encourage requiring agencies institute anti-displacement policies (p. 1-35) To that end, we recommend the addition of a bullet to Volume 2, p.15 (Recommendations for Administering Agencies to Maximize Funding to Benefit Disadvantaged Communities), requiring grant applicants with projects located within or benefiting a DAC to engage that DAC in project design and implementation. We strongly agree that the bullets in 2-2 p. 2-15 ‘Examples of Maximizing Benefits’ but to have them be recommendations and not requirements is a missed opportunity to award applications that address community needs and are required to provide benefits and that outreach to community members happens.

We still ask you remove additional barriers for DAC in applying to GGRF programs, we request that ARB require from agencies a minimum of 60 days between the notice of funding and proposal deadline. We also suggest that ARB include in the guidelines a recommendation that matching funds should be waived for projects located within DAC. For example there were 2-week turn-arounds in some application processes.

We would like ARB to ensure distribution of GGRF funds to a diverse group of nonprofits, agencies, municipalities and small business can be eligible applicants.

We recommend that ARB require agencies to create set-asides within GGRF programs for planning and the creation of decision-making tools that will ultimately lead to projects that reduce GHGs. This will greatly assist communities to assess and prioritize needs, as well as develop innovative strategies for future GHG reduction and participation in GGRF programs.

Please contact me if you would like to discuss any of the above in greater detail. I can be reached at (916) 557-1673

Sincerely,

Rico Mastrodonato

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The Trust for Public Land