

November 13, 2015

Chairman Mary D. Nichols and Executive Officer Richard Corey
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Cap and Trade Auction Proceeds Triennial Investment Plan for 2016-2019

Dear Chairman Mary D. Nichols and Executive Officer Richard Corey,

Thank you for the hard work that Air Resources Board (ARB) staff has done to make the Auction Proceeds Triennial Investment Plan for 2016-2019 possible. We are writing as a coalition of groups serving the Sacramento Region to recommend changes to the 2016-19 draft Investment Plan. As a region, we have formed a coalition of public agencies and organizations working together to support and advance applications for key Greenhouse Gas Reduction Fund grants, and have complimented that effort with a robust public engagement process in “disadvantaged communities.” Our comments are directly informed by those efforts.

We appreciate that the current draft plan includes strategies for generating green jobs, making businesses and multi-family housing developments eligible for energy improvements, investments in natural and working lands, and promoting community solar and alternative transportation. These strategies will go a long way in helping California achieve our climate goals, and directly reflect the priorities of stakeholders in our region.

We also continue to affirm following principles:

- Center proposed efforts around “disadvantaged communities,” or those most impacted
- Advance a systems approach to maximize greenhouse gas reductions as well as co-benefits
- Increase coordination among agencies in investment decisions to allow for collective decision-making and effective programming

We have identified several additional strategies that we think will further the goals of the plan while also achieving significant co-benefits for residents of our state’s “disadvantaged communities”:

- **Ensure that community centers are eligible for all programs, particularly regarding electric vehicle charging stations.** “Community Centers” should include school sites (operational and non-operational), churches, and any large space used for community-benefit purposes. These gathering places for the community are centrally located within “disadvantaged communities.” Investments at those sites would greatly advance California’s climate goals.
- **Include urban agriculture as a strategy for both carbon sequestration and greenhouse gas emission reduction.** And dedicate a greater percentage of

auction proceeds to urban and rural farms that enhance soil health. In addition to the significant benefits to the environment, urban agriculture can facilitate community compost programs that reduce food waste, increase urban greenspace, reduce the need to drive long distances to grocery stores or markets, and create meaningful economic development opportunities for residents of “disadvantaged communities.”

- **Expand and clarify language in the current plan to ensure inclusion of successful agricultural climate strategies.** Improving the health of agricultural soils with the use of compost, cover cropping, crop rotations, conservation tillage, and other improved farming practices can increase the carbon storage capacity of soils and reduce overall GHG emissions while reducing air and water and synthetic fertilizer use
- **Create a new goal to layer as programs as much as possible.** Any new improvement or development funded by the Greenhouse Gas Reduction Fund should be able to take advantage of other funded programs and services to ensure maximum impact. This may require more cohesion in the application process, or allowing funded programs under Urban Forestry, Transit, Energy Efficiency and Weatherization, and Affordable Housing and Sustainable Communities to directly collaborate to ensure the creation of effective referral processes.

Finally, we would respectfully ask ARB and administering agencies to allow at least three weeks of review for new policy documents before closing public comment or holding public meetings. While we understand the production of these documents is a monumental task, a longer timeframe for public review would better facilitate the full and meaningful participation of residents and groups located within “disadvantaged communities” as required by Assembly Bill 32.

Thank you for your time and consideration of these comments.

Sincerely,

Brenda Ruiz
Slow Food California

Brenda Ruiz
Slow Food Sacramento

Christal Waters, Resident
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Submitted electronically at
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ws&comm_period=1)