



August 14, 2015

Ms. Shelby Livingston, Chief
Climate Investment Branch
California Air Resources Board

RE: Funding Guidelines for Agencies that Administer California Climate Investments

Dear Ms. Livingston:

Thank you for the opportunity to provide comments on the draft funding guidelines for agencies that administer California Climate Investments (CCIs). The Center for Creative Land Recycling (CCLR or "see clear") is the state's only organization solely dedicated to brownfield and infill development and we play an integral role in the revitalization of many sites around the state. Our work is accomplished through training, technical assistance, and small grants and loans for communities and community developers who are attempting to turn around vacant or environmentally distressed properties, including the infill sites targeted by some GGRF-funded programs.

1. Equitable Inclusion of Rural Communities

The Draft Concepts doc for the Second Investment Plan recognizes the importance of rural communities in state-wide GHG reduction efforts (See Section III.H. on page 7). Furthermore, Section IV.A.5 of the draft funding guidelines encourage consistency with the state planning priorities, "which are intended to promote equity ... in the state, including in urban, suburban, and rural communities." (Government Code, Section 65041.1). However, in the initial rollout of GGRF-funded programs this has not always been the case. For example, the Affordable Housing and Sustainable Communities program's first round application procedure had a number of elements skewing the program in favor of urban areas, especially in the ARB's GHG reduction quantification methodology. Infill is commonly viewed as solely an urban issue, yet it is in rural communities where one is confronted with on-the-ground evidence of the link between encouraging efficient land use patterns and preservation of agricultural land and open space. It is therefore crucial that rural communities have fair and equal access to *all* GGRF-funded programs.

Recommendation: Amend third of six GHG quantification methodology goals in section V.A.4. (p 26) to "Provide uniform methods that can be *equitably* applied Statewide and are accessible by all applicants."

2. Transparent Appeals Process

In order for a GGRF-funded program to provide fair and equitable access to all California communities it is critical that it contain a transparent appeals process. An appeals process ensures that the application was provided full and accurate consideration, and also helps to hold the implementing agency fully accountable for its administration of the program. However, the draft funding guidelines fail to mention the need for an appeals processes even once, either under the project selection criteria or under the transparency section.



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Recommendations:

- **Amend the second bullet of the “Transparency” Section IV.B.1. (p 23) by adding “..., including the appeals process.” to the end of the sentence.**
- **Amend the fifth bullet (“Project selection criteria”) of Section VI.B.4. (p 34) to include sentence: “Describe the appeals process available to applicants who were not selected and/or received a competitive score lower than expected.”**

Thank you again for providing this opportunity to provide recommendations for the draft funding guidelines for agencies that administer California Climate Investments (CCIs). We appreciate your effort and the efforts of the Air Resources Board to reduce GHG emissions throughout California.

Sincerely,

Sarah Sieloff
Executive Director, CCLR

Evan Reeves
Policy & Research Director, CCLR