



November 13, 2015

Ms. Mary Nichols, Chairman
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Cap & Trade Auction Proceeds: Draft Second Investment Plan

Dear Chairman Nichols:

On behalf of the numerous signatories listed below, comprised of active and passive landscape and outdoor interests, please accept our sincere appreciation for the terrific work product that your agency has developed in the draft plan. Much of the content outlined for possible investment including "the greening of the built environment" was a most welcomed addition and we are indebted to the California Air Resources Board (CARB) for recognizing the importance of investments in this area. While we understand that the plan is a guidance document that establishes investment parameters, we wish to reiterate and expand upon some of the recommendations proposed in our original comment letter dated August 18, 2015 to encourage further detail in the plan as to greening investments that, along with carbon reduction, provide important co-benefits to the citizens of this state.

- Possible Urban Greening related investments for consideration that provide GHG benefits:
 - **Land Acquisitions:** Strategic investment in the protection and proper stewardship of lands in urban, suburban, and rural settings will assist in addressing future growth patterns that alter the human and physical landscape that often dictate carbon release patterns. Opportunities and incentives to acquire lands through fee title or the prevention of sprawl-oriented development through conservation easements are critical for carbon storage, improved water quality and supply, flood mitigation, more climate resilient natural systems, and overall healthier watersheds.
 - **Bringing Parks and Other Activity Centers to the People:** A tremendous amount of energy has been invested in arguing for the benefits of transit, active transportation, and innovative land use (i.e. Transit Oriented Development) practices as a low-carbon means of connecting people to centers of activity (work, school, shopping and other destinations). However, we think there is also great value in investing in civic improvements including public parks, community centers, and libraries closer to population clusters that lack these facilities. Investments in policies that spur the practice of co-location of public amenities with other public or private improvements and investments in the improved utilization of existing public spaces (e.g. school grounds) will lead to reductions in Vehicle Miles Traveled (VMTs) as high use and visitation destination points, such as parks, can be more easily accessed by the general public. In addition to mobility benefits and reduced vehicular trips, these projects also have great potential to realize the land acquisition benefits stated above.
 - **Connecting Communities/Safe Routes to Parks:** We acknowledge that the state has an ambitious Active Transportation Program and an Affordable Housing/Sustainable Communities Program that provides for grant opportunities to invest in non-motorized improvements. However, the plan needs to foster more intentionality in connecting communities through human-powered travel. For example, the East Bay Regional Park District operates over 200 miles of paved trails that parallel major interstate corridors but there are many gaps that prevent seamless connections from community to community. Investment in gap funding and the expansion of comprehensive regional bicycle networks incorporating improvements such as the “smoothing of trails” or design features to encourage non-stop cycling/pedestrian mobility (tunnels, over passes, signal synchronization) encourage non-motorized commuter ridership and reduce vehicle stops as well. Investing in non-motorized infrastructure that fosters human-powered travel options to destination points such as parks will also reduce GHG’s.
 - **Leveraging of Funds:** While we understand the challenges that disadvantaged communities confront relative to scarce fiscal resources, we would encourage the plan recognize and incentivize, when appropriate, the combining of state-federal-local-NGO resources to maximize community/carbon reduction benefits.

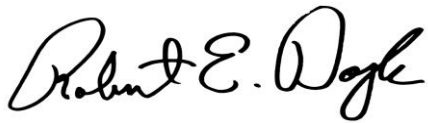
In closing, we wish to restate our gratitude for the work of CARB on this front and look forward to continuing the dialogue through this round of funding and into the future to improve climate conditions and provide needed investment in California’s communities. If you have any questions, please contact Doug Houston at 916-447-9884.

For more information, please contact Doug Houston at (916) 447-9884.

Sincerely,

A handwritten signature in black ink, appearing to read "Steph Stephens".

Stephanie Stephens
Executive Director, California Park & Recreation Society (CPRS)

A handwritten signature in black ink, appearing to read "Robert E. Doyle".

Robert E. Doyle
General Manager, East Bay Regional Park District

A handwritten signature in black ink, appearing to read "Rue Mapp".

Rue Mapp
Founder & Chief Executive Officer, OutDoor Afro

A handwritten signature in black ink, appearing to read "Rick Sloan".

Rick Sloan
President, California Association of Recreation and Park Districts (CARPD)

A handwritten signature in black ink, appearing to read "José G. González".

José G. González
Founder, Latino Outdoors

A handwritten signature in blue ink, appearing to read "Doug Houston".

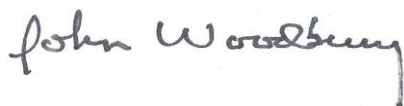
Douglas D. Houston
Executive Director, State Park Partners Coalition (SPPC)




Caryl Hart, Ph.D.
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Andrea Mackenzie
General Manager, Santa Clara Valley Open Space Authority



John Woodbury
General Manager, Napa County Regional Park and Open Space District



Steve Hoagland
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Mark Stanley
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General Manager, Midpeninsula Regional Open Space District