



November 13, 2015

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

RE: Cap-and-Trade Auction Proceeds Draft Second Investment Plan: Fiscal Years 2016-17 through 2018-19

Dear Ms. Nichols

TreePeople appreciates the opportunity to make the following comments on the California Air Resources Board's (Board) Draft Second Investment Plan for cap-and-trade auction proceedings (Investment Plan). TreePeople engages in urban greening and stormwater management efforts in the Los Angeles Region in order to maximize the health of local communities and watersheds.

We respectfully request that you consider the following comments:

Prioritize Projects that Achieve both Emission Reductions and Resilience

While mitigating the onset of climate change through emissions reductions is of utmost importance, it is also critical to prioritize adaptation and resilience against existing and future climate change impacts like increased temperature, drought, flooding, and wildfire. Many current investments in tree planting and sustainable communities already do this. We recommend that The Second Investment Plan should further prioritize projects that concurrently mitigate emissions and help to adapt to climate change conditions. Many projects, including green infrastructure projects, successfully meet both of these goals while providing a host of other benefits.

In addition, while many of the draft investment concepts outlined in the Investment Plan (page 28) facilitate greater climate resilience, lacking is explicit language and/or methods for articulating the value of climate resiliency and the importance of amplifying investments in reduction strategies that support climate resilience. Clearer criteria and guidelines for prioritizing selection of dual benefit reduction and resilience strategies would help drive greater implementation of resilience strategies.

Urban Forestry & Greening

We appreciate the inclusion of urban forestry and greening in the strategies identified in the Investment Plan. As stated on page 43, such projects yield a multitude of benefits, including carbon sequestration, air filtration, community cooling, improved active transportation and recreation conditions, improved storm-water runoff, and water retention. Collectively, these projects not only help to reduce and sequester greenhouse gas emissions, but also help our communities build resilience to mitigate the negative impacts of climate change we are already experiencing.

We strongly encourage continued investments in CAL FIRE's Urban and Community Forestry Program, and firmly believe these investments are needed now to provide green infrastructure, and help to meet the 40% GHG reduction goals highlighted in Governor Brown's Executive Order from April, 2015. In addition to the Urban and Community Forestry Program, we also support additional investment in other urban greening/green infrastructure projects including green streets, river parkways, and other green spaces that can provide a wide array of GHG mitigation and resiliency benefits.

Low Carbon Water System

We would like to commend the Board for advancing the prioritization of water efficiency and conservation in the Second Investment Plan (page 39). There is a clear and significant nexus between the energy and water sectors, and reducing demand for water through an integrated approach will provide cross-sector benefits including reduction of energy-related greenhouse gas emissions and helping communities adapt to drought conditions.

Additionally, cap and trade auction revenue is not currently funding multi-benefit water projects such as stormwater capture, which both reduce the energy intensity of our water supply and improve local and regional water self-reliance. Funding these types of projects will help California reach our long-term climate and water conservation goals and provide immediate, near-term drought solutions.

Integrated Approach

We highly suggest that the Board encourage local and regional integration of projects as much as possible. While institutional structures often necessitate a sector-based approach, projects that yield the greatest multiple benefits for emissions reductions and climate change adaptation transcend boundaries between energy, water, land management, and urban planning sectors. This approach will maximize climate-related benefits while greatly improving local engagement and agency coordination.

In addition, an integrated approach can be facilitated by using a tool that provides a comprehensive, integrated analysis and as such we recommend the use of such a tool. An example would be TreePeople's LOGIC Model (previously T.R.E.E.S. model) that TreePeople has successfully used to estimate costs and benefits of multi-benefit projects. The tool breaks down benefits into sectors (such as benefits to water quality, water supply, etc.), and then monetizes the amount of the various benefits. This allows for agencies or others who might benefit from these multi-benefit, green infrastructure projects to see the return on investment from funding or co-funding such a project.

TreePeople would like to thank the Board for considering our comments on the Second Investment Plan. We see the investment of cap and trade auction revenue as an important opportunity to encourage the development of multibenefit projects that simultaneously reduce greenhouse gas emissions, incent green infrastructure, promote integrated water management, protect natural resources, and improve our communities.

We look forward to working with you on this process.

Sincerely,



Deborah Weinstein Bloome