

**Comment 1 for Funding Guidelines For Agencies that Administer California Climate Investments (fundingguidelines15) - Non-Reg.**

First Name: Gordon

Last Name: Piper

Email Address: Rgpiper33@gmail.com

Affiliation: Oakland Landscape Committee

Subject: Opposition to Discriminatory ARB Funding Guidelines

Comment:

See attached comments.

Attachment: 'www.arb.ca.gov/lists/com-attach/1-fundingguidelines15-UzBVPANvUmxSMVQ6.docx'

Original File Name: Comments To California Air Resources Board re GGRF Guidelines, Sept. 4 Version.docx

Date and Time Comment Was Submitted: 2015-09-13 16:01:39

No Duplicates.

**Comment 2 for Funding Guidelines For Agencies that Administer California Climate Investments (fundingguidelines15) - Non-Reg.**

First Name: Gary

Last Name: Phillips

Email Address: lauren.crandell@cityofsanrafael.org

Affiliation: Mayor, City of San Rafael

Subject: Cap and Trade Funding Guidelines

Comment:

Please see attached letter.

Attachment: 'www.arb.ca.gov/lists/com-attach/2-fundingguidelines15-BzUCNFZmAGZWfINj.pdf'

Original File Name: 2015.09.18\_Cap and Trade Program Funding Guidelines\_LTR.pdf

Date and Time Comment Was Submitted: 2015-09-21 12:17:51

No Duplicates.

**Comment 3 for Funding Guidelines For Agencies that Administer California Climate Investments (fundingguidelines15) - Non-Reg.**

First Name: Joyce

Last Name: Dillard

Email Address: dillardjoyce@yahoo.com

Affiliation:

Subject: Comments ARB Funding Guidelines for Agencies that Administer California Climate Investment

Comment:

Attached.

Attachment: 'www.arb.ca.gov/lists/com-attach/3-fundingguidelines15-BmUFbFE9UG4GZVM9.tif'

Original File Name: Comments ARB Funding Guidelines for Agencies that Administer California Climate Investments due 9.21.20150001.tif

Date and Time Comment Was Submitted: 2015-09-21 13:22:58

No Duplicates.

## **Comment 4 for Funding Guidelines For Agencies that Administer California Climate Investments (fundingguidelines15) - Non-Reg.**

First Name: Ben  
Last Name: Russak  
Email Address: brussak@libertyhill.org  
Affiliation: Liberty Hill Foundation

Subject: Comments on Draft Funding Guidelines for Agencies that Administer California Climate I

Comment:

September 21, 2015

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

Re: Comments on Draft Funding Guidelines for Agencies that Administer California Climate Investments

Dear Chair Nichols and Air Resources Board Members:

The Liberty Hill Foundation appreciates this opportunity to submit the attached report for comment on the Draft Funding Guidelines for Agencies that Administer California Climate Investments and the subsequently released supplemental text. The report, Advantaging Communities: Co-Benefits and Community Engagement in the Greenhouse Gas Reduction Fund—co-sponsored by the UCLA Institute for Research on Labor and Employment, the UCLA Labor Center, and Liberty Hill Foundation—contains a set of policy recommendations informed by collaborative engagement with grassroots environmental justice organizations over the past year.

While co-benefits are ultimately subordinate to carbon reduction in GGRF programs, they are not optional. California legislation clearly mandates maximizing economic, environmental and public health co-benefits in all climate investment strategies, with a particular focus on directing those benefits to DACs. Advantaging Communities provides policy recommendations to more effectively prioritize these benefits in DACs to the maximum extent feasible while maintaining a primary focus on GHG reduction.

The recommendations focus on how to best guarantee GGRF investments create significant and lasting benefits in DACs:

- Maximize economic, environmental and public health benefits (in addition to GHG reduction) through investments that further improve the lives of low-income populations with an emphasis on the generation of quality employment opportunities
- Increase community resilience by incentivizing anti-displacement methods and leveraging local inclusionary housing ordinances

- Ensure authentic community engagement by prioritizing investments made in collaboration with grassroots community-based organizations (CBOs) or others involved in a participatory development process

This report is offered in full support of the SB 535 Coalition's four primary suggestions outlined in their comment letter, submitted August 19, 2015: (1) require all SB 535 investments to address high priority disadvantaged community needs as an eligibility requirement (2) concretely require agencies to prioritize the SB 535 investments that provide the most significant benefits to DACs (3) ensure more benefits are targeted to the neediest end-users, and (4) provide clear prohibitions on direct displacement and strategies for avoiding economic displacement.

Recommendations include setting a baseline scoring criteria for co-benefits, community engagement and anti-displacement measures for competitive SB 535 funds; leveraging high-road labor ordinances and inclusionary housing policies currently existing in local jurisdictions; and to identify and incentivize community engagement methods specifically applicable to GGRF programs.

While it is likely too late to consider many of the recommendations contained in Advantaging Communities for inclusion in the Funding Guidelines set to be finalized on September 24, 2015, hopefully the submission of this report can begin a conversation about how to proactively initiate important strategies to protect vulnerable populations from the direct displacement of projects receiving SB 535 funding and build economic and social resiliency in DACs to stabilize low-income households from increased costs of living associated with the economic displacement.

Sincerely,

Ben Russak  
Policy Analyst  
Liberty Hill Foundation

Attachment: 'www.arb.ca.gov/lists/com-attach/4-fundingguidelines15-B2YCYFwrVmQEbfIm.pdf'

Original File Name: Advantaging Communities FINAL.pdf

Date and Time Comment Was Submitted: 2015-09-21 16:07:17

No Duplicates.

**Comment 5 for Funding Guidelines For Agencies that Administer California Climate Investments (fundingguidelines15) - Non-Reg.**

First Name: Kerri

Last Name: Timmer

Email Address: ktimmer@sierrabusiness.org

Affiliation: Sierra Business Council

Subject: SBC comments on 9/4/15 Proposed Funding Guidelines for Agencies Administering GGRF funds

Comment:

Please see attached letter.

Thank you.

Attachment: 'www.arb.ca.gov/lists/com-attach/5-fundingguidelines15-UyACZgBiAg4HZgNk.pdf'

Original File Name: SBC\_GGRF\_ARBFundGlines\_2015\_09\_21.pdf

Date and Time Comment Was Submitted: 2015-09-21 16:21:32

No Duplicates.

## **Comment 6 for Funding Guidelines For Agencies that Administer California Climate Investments (fundingguidelines15) - Non-Reg.**

First Name: Rico

Last Name: Mastrodonato

Email Address: rico.mastrodonato@tpl.org

Affiliation: Trust For Public Land

Subject: Comments: - Funding Guidelines for Agencies - CA Climate Investments  
Comment:

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  
Senior Manager Government Affairs  
The Trust for Public Land

Attachment: 'www.arb.ca.gov/lists/com-attach/6-fundingguidelines15-BTRVfVEPUWMHc1Iw.docx'

Original File Name: 1. ARB guidelines to agencies comment letter\_TPL\_9.21.2015.docx

Date and Time Comment Was Submitted: 2015-09-21 16:39:37

No Duplicates.



**Comment 7 for Funding Guidelines For Agencies that Administer California Climate Investments (fundingguidelines15) - Non-Reg.**

First Name: Kaylon

Last Name: Hammond

Email Address: khammond@leadershipcounsel.org

Affiliation:

Subject: Comments on the Proposed Funding Guidelines Released September 4, 2015

Comment:

Please see attached comment letter on current draft of the Funding Guidelines, as well as previous comment letters on previous drafts and the supplemental text. Thank you.

Attachment: 'www.arb.ca.gov/lists/com-attach/7-fundingguidelines15-WzgGb1c7BTtVNlM9.zip'

Original File Name: Comments on Funding Guidelines.zip

Date and Time Comment Was Submitted: 2015-09-21 16:15:44

No Duplicates.

**Comment 8 for Funding Guidelines For Agencies that Administer California Climate Investments (fundingguidelines15) - Non-Reg.**

First Name: Marybelle

Last Name: Nzegwu

Email Address: mnzegwu@publicadvocates.org

Affiliation: Public Advocates

Subject: Comments on Proposed Funding Guidelines

Comment:

See attachment.

Attachment: 'www.arb.ca.gov/lists/com-attach/9-fundingguidelines15-UyAFYVdjUTEKOrEp.pdf'

Original File Name: SB535 ARB Comment Supplement 092115.pdf

Date and Time Comment Was Submitted: 2015-09-21 16:56:50

No Duplicates.

**There are no comments posted to Funding Guidelines For Agencies that Administer California Climate Investments (fundingguidelines15) that were presented during the Board Hearing at this time.**