



CENTER FOR
CREATIVE
LAND
RECYCLING

*Redeveloping Land for
Sustainable Communities*

August 28, 2015

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

RE: Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan

Dear Ms. Livingston:

Thank you for the opportunity to provide comments on the Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan (Concept Paper). The Center for Creative Land Recycling (CCLR) is a national non-profit based in San Francisco and established in 1996. CCLR provides technical assistance to municipalities, non-profits, and community-oriented developers to advance the sustainable and equitable reuse of underutilized land.

CCLR supports the inclusion of infill development as part of the sustainable communities concept within the second investment plan. Infill development is a critical tool for creating dense, sustainable and low-carbon communities. Infill is a necessary but insufficient tool to support community revitalization. CCLR therefore encourages California Climate Investments (CCI) to explicitly acknowledge brownfield development as an integral component of this investment area. We encourage CCI to explicitly add language to this effect, so that the text for the sustainable communities concept is amended to read “Support for sustainable communities strategies, including expansion of public transit and active transportation infrastructure, bicycle utilization, infill **and brownfields** development, agricultural land conservation, and transit-oriented affordable housing.”

The U.S. Environmental Protection Agency defines a brownfield as “a real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.” Brownfields are challenging to redevelop under the best of conditions, and without targeted support, it is even more difficult to return these properties to productive reuse. With the appropriate support, however, brownfields have the power to spur revitalization efforts in disadvantaged communities, turning blighted eyesores into productive community assets.

Brownfields are important to the concept plan because they provide the GHG reduction benefits of infill development, yet yield more triple bottom line benefits. Brownfields are often located in disadvantaged communities, where their cleanup and reuse will benefit public health, local economies, and the environment. Because brownfields are often well placed with respect to existing infrastructure, these properties present ready opportunities to reduce emissions and VMT, increase the supply of affordable housing, provide parks and open space, and create vibrant commercial corridors that can support a dynamic ecosystem of local businesses and create jobs.

With the end of redevelopment agencies, there is a critical need for funding to move contaminated and potentially contaminated properties back to productive use, which is why including brownfields in the second investment plan is critical to the continued success of neighborhood redevelopment and revitalization for all Californians, but especially for those who have suffered for too long under the environmental burden that brownfields pose.



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Thank you again for providing this opportunity to provide recommendations for the Concept Paper. 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