

September 1, 2015

Chairman Mary D. Nichols and Executive Officer Richard Corey
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Cap and Trade Auction Proceeds Triennial Investment Plan for 2016-2019

Dear Chairman Mary D. Nichols and Executive Officer Richard Corey,

Thank you for the hard work that ARB staff has done to make the Auction Proceeds Triennial Investment Plan for 2016-2019 possible. We are writing as a coalition of groups serving the Sacramento Region to recommend changes to the 2016-19 draft Investment Plan. As a region, we have formed a coalition of public agencies and organizations working together to support and advance applications for key Greenhouse Gas Reduction Fund grants, and have complimented that effort with a robust public engagement process in disadvantaged communities. Our comments are directly informed by those efforts.

Expansion of Energy and Weatherization Programs

Funds for the Energy Efficiency and Low-Income Weatherization Program are currently limited to income eligible, single-family households in target census tracts. Since implementation of this program is spread across several grantees, an income-eligible household that receives one program benefit is not automatically enrolled to receive other program benefits from the Urban Forestry, Low-Carbon Transportation, WET, and Water Efficiency Programs. Further, funding does not allow grantees to make home improvements conducive to the goals of the program, like repairing a roof so solar panels can be installed, or in lieu of solar installing a cool roof. Finally, the program does not include business owners or community centers in targeted neighborhoods, even though the sustainability of those buildings is critical for the environmental, social, health, business resiliency and economic benefits they can provide to those neighborhoods.

- **Programs should create project teams that can automatically enroll income-eligible households in all program benefits as appropriate. The project team should consult with MPOs and local government officials to ensure maximum efficiency in program delivery, with the opportunity to leverage other local resources for improved co-benefits and outcomes.**
- **Funds should be allowed to make home improvements (such as a roof repair or insulation replacement) related to energy efficiency, weatherization, and tree planting. Funding should also be able to be used for technologies like cool roofs, radiant barriers, wind energy, and gray water systems.**
- **Multi-family housing units within targeted census tracts should be eligible for all programs.**

- **Small businesses and community centers¹ in targeted census tracts should also be eligible if they can demonstrate that the owners, at least one of their employees, or at least 10% of their patrons live in the surrounding neighborhood.**
- **If nearby homes are not suitable for solar panels, businesses and community centers can have them installed to generate renewable energy to serve the facilities' electricity needs as well as the needs of surrounding income-eligible households. Solar panels could also be allowed on vacant land or to cover parking.**

Inclusion of Streetscape Improvements

Many residents of disadvantaged communities will attribute poor streetscapes as one of the primary reasons they do not walk, bike, or take transit to their destinations. In Sacramento, as in many regions throughout the state, our air quality is heavily impacted by those transportation choices. There are not sufficient funds dedicated to streetscape improvements as larger infrastructure projects generally take priority. Streetscape projects are low-budget and high-impact, providing great opportunities for community involvement.

- **Funding for streetscape improvements to improve the ability to safely walk and bike, while calming traffic, should be allocated to metropolitan planning organizations throughout the state. These funds can be used for land acquisition, LED lighting installations, "Complete Street s" construction, tree planting and drought-tolerant landscaping, road overlay (as related to slowing traffic, adding and/or separating bike lanes, road diets and increasing alternative transportation), bus stop infrastructure, and bike parking facilities.**

Inclusion of Urban Agriculture

Urban agriculture is growing in popularity in our state as a viable means to increasing access to healthy food while providing people with a source of income. The City of Sacramento, along with several other jurisdictions, has recently passed an urban agriculture ordinance to make growing and selling food easier for residents.

- **The Urban Forestry program should be expanded and clearly allowed to fund creation of new and maintenance/expansion of existing urban agriculture spaces. All sources of carbon reduction should be taken into account in project scoring criteria, not just carbon sequestration.**

Expansion of EV Charging Station Resources

Electric Vehicle Charging Stations are expensive to install in existing communities, in particular disadvantaged communities and multi-family complexes. While a new

¹ "Community Centers" should include school sites (operational and non-operational), churches, and any large space used for community-benefit purposes.

incentive program for businesses was just released, the cost for infrastructure and the chargers is very expensive and not cost-effective for most small businesses. Cities and Counties can advance more public charging stations in key locations if there were incentive funds, rather than loans, to offset these costs.

- **Funding for Electric Vehicle Charging Stations should be expanded to include grants for infrastructure and charging station equipment, particularly in disadvantaged communities and multi-family units. New affordable multi-family developments and business complexes should be particularly targeted for electric vehicle charging to avoid retrofit costs in the future.**
- **There should be special measures taken to ensure that access to EV fleet and charging station monies are available to small businesses.**
- **Funding for electric vehicle charging stations in multi-family housing should be an eligible element of this program, especially in existing multi-family low-income housing projects.**

Green Jobs as a Priority Co-Benefit

The source of much pollution in our state rests on the fact that our industries are not all “green.”² To address this, California needs to put a high priority on training people to start careers in green industries. As awardees administer their various grant programs, they should be required to train and employ residents from targeted communities to ensure the maximum benefit of that investment.

- **All agencies and grant awardees must demonstrate that they train and employ residents of targeted communities in green jobs as much as possible. To the extent feasible, awardees should explain how jobs for these residents will be sustained after the project is complete. For example, if a project will build affordable housing, the applicant should write its budget to allow for the training and employment of residents to build that housing, and address how residents will continue to be employed either on-site, in future projects, or in other positions.**

Ensuring Equitable Access to Funds by Creating Better Accountability

SB 535 prioritizes funding to the most disadvantaged communities in our state, but competition for those funds may inadvertently prevent funding from going to communities with the most need. Competition also discourages collaboration and transparency, which makes it hard for community members to track and influence applications. Assembly Bill 32 requires that public and private investment be directed toward the most disadvantaged communities in California to provide an opportunity for community institutions to “participate in and benefit from statewide efforts to reduce greenhouse gas emissions.” Measures should be taken to ease public access to this process.

² Green jobs are defined by jobs in businesses, public agencies or community organizations that produce goods or provide services that benefit the environment or conserve natural resources.

- **The ARB and administering agencies should require at least three weeks for review of new policy documents before closing public comment or holding public meetings.**
- **Administering agencies should post all grant review criterion and applications received on one, central website to promote transparency and public engagement.**
- **All agencies administering GGRF should provide technical assistance to community based organizations to promote the engagement of disadvantaged communities. When necessary, ARB should exercise its authority to distribute cap and trade revenues to fund grants that will help agencies adhere to AB 32's "participation" requirement via agency- or board-level technical assistance. Agencies should also make provisions to reduce or waive match funding requirements for applicants that may not have the means to provide that funding.**
- **Grant recipients should conduct data collection and report on the realization of proposed project co-benefits. Data collection should also be an eligible expense from grant funding. The ARB and administering agencies should require applicants to provide the contact information (in accordance with privacy considerations) for residents within the census tract their project targets to illustrate community support for the application, in addition to outlining their community engagement process in the development of the application.**
- **The ARB and administering agencies should require applicants to get at least one letter of support from the local jurisdictions where the project will occur to ensure alignment with local initiatives and planning efforts and delivery of a quality project.**

Thank you for your time and consideration of these comments.

Sincerely,

Chris Brown, Organizer
350 Sacramento

Elaine Hebert, President
Southside Park Neighborhood Association

James Shelby, President & CEO
Greater Sacramento Urban League

Jesse Reese, President
Meadowview Neighborhood Association

Linda Roberson, Park Planner and Urban Designer
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Michael Blair, President
South Oak Park Community Association

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Rachel Rios, Executive Director
La Familia Counseling Center

Rick Bettis, Natural Resources Director
League of Women Voters Sacramento County

Submitted electronically at

[http://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=investplan2015-
ws&comm_period=1](http://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=investplan2015-
ws&comm_period=1)