



March 4, 2013

Ms. Shelby Livingston  
Chief, Climate Change Program Planning  
& Management Branch, Stationary Source Division  
California Air Resources Board

Regarding: Comments on SB 535 Cap-and-Trade Auction Proceeds Investment Plan

Dear Ms. Livingston:

Pacific Asian Consortium in Employment (PACE) is a non-profit community development corporation founded in 1976 to provide economic solutions to meet the challenges of employment, education housing, business development and energy efficiency and conservation among Asian Pacific Islander and other ethnic communities. Over the past 37 years we have provided services to more than 850,000 low income, ethnic minorities in low income communities throughout Southern California.

PACE is proud to have been at the forefront of consumer energy use reduction since 1983. PACE's Energy and Environmental Services programs focus on providing education, financial assistance and installation of energy use reduction measures. In the 30 years that we have been offering these environmental programs, we have served more than 480,000 low-income, ethnic minorities—including more than 14,574 in 2012. PACE's ethnically diverse staff with linguistic and cultural competence in more than 40 languages and dialects enables us to reach populations that are virtually unreachable by others.

These services provided by PACE promote decreased use of fossil fuel-based heating and cooling which, in turn, helps to reduce greenhouse gas emissions, help maintain a cleaner environment, provide a safer and more comfortable living and work space. Additionally, energy use reduction helps low income people spend less money on utilities, enabling them to use their savings for other living necessities.

PACE has been an active provider of these services through the State's Low Income Home Energy Assistance Program (LIHEAP), the Department of Energy's Weatherization Assistance Program (WAP), as well as through Southern California Gas Company and Southern California Edison Company's Energy Savings Assistance Program (ESAP). In addition to weatherizing and retrofitting single and multi-family (rental) homes, PACE also provides energy use reduction and financial education to our clients that help them to reduce energy use and save money.

PACE **supports** the use of Cap-and-Trade auction proceeds to benefit the communities that have been and continue to be impacted most by environmental pollution and higher-than-average greenhouse gas emissions. We have reviewed the list of priority communities identified to receive remediation programs to address air quality and removal of toxic substances in their air and water, and to receive community-based programs improve the socio-economic conditions in these disadvantaged communities by increasing jobs opportunities, direct services and other economic opportunities.

PACE specifically recommends that:

- A multi-dimensional approach be provided in low income/high impact communities. The **services should provide a cleaner environment, as well as health, safety, education and economic benefits** to residents. Of primary importance are opportunities for education, jobs and health services.



Pacific Asian  
Consortium  
in Employment

- **Programs and services must accommodate the unique linguistic and cultural characteristics of each priority community** to be sure the most vulnerable populations are reached. To accomplish this, the Air Resources Board should partner with reputable community-based organizations (CBOs) that have the capability, capacity and experience to deliver these services. Locally-based CBOs are trusted by the community and they are equipped with the necessary language skills and cultural sensitivity to breach these barriers.
- **Weatherization and residential retrofits should be among the top priority programs funded by the Cap-and-Trade Investment Fund.** Weatherization and retrofits of homes in low income communities provide the most direct, cost-effective and beneficial impact to residents. Weatherization provides energy-efficient, safe and comfortable homes that, with a life cycle of up to 20 years, also bring long term benefits.
- **Programs and services specifically directed towards multi-family residential buildings in the identified areas should be given higher priority.** It is in these multi-family residential buildings where most low-income and vulnerable residents reside. A high percentage of these buildings provide minimal or no heating and cooling. Weatherization and other retrofit services will have a significant beneficial impact and increase comfort, health and safety while fostering conservation and savings.
- The Air Resources Board should give **priority to organizations that can also provide related collateral services (co-benefits) including green jobs training and placement, energy efficiency education, and small business development** to spur job creation and capital generation/regeneration.
- In the spirit of transparency and accountability, **contracts for programs must be performance-based.** Priority should be for Cap-and-Trade Investment Fund contracts with specific deliverables to be awarded to organizations that have the ability, experience and infrastructure to “hit the ground running”.
- For efficiency & effectiveness existing infrastructure should be leveraged. Cap-and-Trade auction investment funds should be directed to **existing providers**; no new government agencies or authorities should be formed to oversee the Cap-and-Trade Investment Fund. Further, we believe that management of the fund must reside in one state agency to facilitate service deliver and efficiency.

Please feel free to contact me if you have any questions or require any additional information. I can be reached via email at [kerrydoi@pacela.org](mailto:kerrydoi@pacela.org) or via phone at 213-989-3213.

Thank you for your consideration of PACE's recommendations.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kerry N. Doi".

Kerry N. Doi  
President/Chief Executive Officer

Pacific Asian Consortium in Employment (PACE) programs include job training and placement, affordable housing, early childhood education and attendant parenting education, small business and entrepreneurship development and provision of low-cost loans and other services for more than 60,000 low-income, ethnically diverse people in Southern California each year.