

December 6, 2016

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California Air Resources Board  
1001 I Street  
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**RE: Feedback on Funding Guidelines Supplement**

On behalf of the California Climate Equity Coalition (CCEC) Steering Committee, thank you for preparing and presenting for public comment the draft Funding Guidelines Supplement for Fiscal Year 2016-17 (“Supplemental Guidelines”). The CCEC Steering Committee has a keen interest in ensuring new programs and projects added to the portfolio of California Climate Investments (CCI) help the State meet legal requirements concerning greenhouse gas emissions (AB 32, 2006) and social equity (SB 535, 2012). To this end, our Steering Committee supports much of the Supplemental Guidelines, including the proposed targets for investments within and benefiting disadvantaged communities (DACs), as well as the criteria tables and reporting requirements specific to new programs. Please note that the Healthy Soils program is outside the scope of the CCEC’s purview and is not covered by our comments concerning new CCI programs as a result. Our main recommendations, which are explained below, are to: add the phrase “individuals living in” to the description of AB 1550 (Gomez, 2016), and include employment-related metrics in the reporting tables for the Woodsmoke Reduction Program.

The CCEC Steering Committee appreciates the Air Resources Board (ARB) including in the Supplemental Guidelines a brief description of laws enacted this year that affect California Climate Investments, i.e., AB 1613, SB 859, AB 2722, and AB 1550. We are supporters of those four measures. However, a key phrase about the targeting of program benefits is missing from the first bullet point regarding AB 1550 (on page 2), and should be added so that this item reads: “25 percent to projects within and benefitting *individuals living in* disadvantaged communities.” We thank ARB staff for agreeing to include this phrase during our meeting on November 22, 2016 and recognize that implementation of this clause will require additional discussions beginning in 2017. Furthermore, the CCEC Steering Committee is gathering program-specific input to support implementation of AB 1550 in 2017, which we hope to provide to ARB in advance of the January 2017 public workshops on this topic.

As stated above, we support the targets for investments within and benefiting disadvantaged communities (DACs) proposed for Fiscal Year 2016-17 climate investments (Table 2 on page 6). We agree with continuing to exclude High Speed Rail from the share of

total funds counted toward SB 535 compliance and with the fifty percent target proposed for the Active Transportation Program. We also support the flexibility in allocations to the Affordable Housing & Sustainable Communities, Transit Capital and Transit Operations, Weatherization Upgrades/Renewable Energy, Urban Forestry, and Urban Greening programs, which should enable low-income households and communities outside of DACs to participate in and benefit from these programs. While recognizing current fiscal year funding may be too low for the Woodsmoke Reduction program (\$5 million) to be viable within and for DACs, we would like to take this opportunity to strongly encourage ARB to target incentives to low-income households regardless of where they live.

The CCEC Steering Committee supports the proposal for criteria to evaluate benefits to disadvantaged communities as outlined in Appendix A of the Supplemental Guidelines. For the Woodsmoke Reduction program specifically, we understand the rationale for proposing employment and job training, rather than air quality improvement, as ways for this program to demonstrate benefits to a disadvantaged community. Accordingly, we recommend adding examples of employment-related metrics (e.g., percentage of project work hours performed by residents of a DAC) to the reporting tables for the Woodsmoke Reduction program in Appendix B (Table 3.A-17). For the Transformative Climate Communities program, we recommend adding language to the criteria table that clearly states the requirement for projects to avoid substantial harm, including economic and physical displacement of low-income residents and local businesses. The CCEC Steering Committee members working on Transformative Climate Communities will continue meeting with the Strategic Growth Council (SGC) to discuss program guidelines, and will follow up with ARB regarding additional potential changes to the criteria and reporting tables. Likewise, there may be a need to follow up with organizations involved in Caltrans' Active Transportation Program (ATP) to ensure changes to the guidelines are addressed in the relevant criteria and reporting tables; Jeanie Ward-Waller with the California Bicycle Coalition is a good point of contact if ARB would like to speak with ATP advocates directly ([jeanie@calbike.org](mailto:jeanie@calbike.org)).

Thank you again for requesting feedback on the proposed Supplemental Guidelines. We hope our comments are helpful and please let us know if you have any questions or would like to discuss any of our recommendations.

Sincerely,

Amee Raval, Asian Pacific Environmental  
Network

Bill Magavern, Coalition for Clean Air

Emi Wang, The Greenlining Institute

Chelsea Tu, Public Advocates

Laura Muraida, Strategic Concepts in

Organizing and Policy Education