

September 15, 2014

Mary Nichols, Chair
California Air Resources Board

Re: Comments on Draft Interim Guidance on Investments to Benefit Disadvantaged Communities

Dear Chair Nichols and Members of the Air Resources Board:

We commend ARB for including in its Draft “Interim Guidance on Investments to Benefit Disadvantaged Communities” (released August 22) many of the principles articulated in our August 20, 2014 letter from nearly 60 organizations statewide. The Draft Guidance recognizes that benefits should address the important needs of disadvantaged communities; that the value of benefits should be maximized and that community input should be incorporated into project design. The **535 Coalition, Sustainable Communities for All Coalition, the 6 Wins for Social Justice Network, the California Environmental Justice Alliance** and other social equity and EJ coalitions across California have a shared goal of ensuring that all SB 535 investments provide significant benefits to California’s disadvantaged communities and households.

In a number of critical ways, however, the Draft Guidance falls short in translating the principles into actionable processes necessary to ensure that SB 535’s promise of benefits to disadvantaged communities becomes a reality. We write to reinforce the positive aspects of the Draft Guidance and to suggest solutions to the following key shortcomings:

1. While location is a key factor, benefits should be targeted to disadvantaged beneficiaries, such as low-income households, workers with barriers to employment, and low-income transit riders.
2. Each project’s net benefit must be assessed to ensure it provides significant benefits after harms, such as bringing additional polluting facilities into overburdened neighborhoods or displacing current residents are considered.
3. Investments must be ranked and scored based on how they meet several important environmental, economic and public health criteria and the most significant benefits prioritized.
4. Projects that authentically engage members of disadvantaged communities should receive priority.
5. SB 535’s two set aside categories should be counted separately so that a minimum of 35% of GGRF funds is spent to benefit disadvantaged communities and populations.

We believe these recommended improvements will ensure that SB 535 investments result in tangible, meaningful benefits for disadvantaged communities and households in California.

1. ARB’s Guidance Must Avoid Using Location as the Sole Touchstone for Assessing Whether a Project Provides a Benefit to Disadvantaged Communities.

The Draft sets out the appropriate fundamental guiding principle: that community benefits should “directly address[] important needs commonly identified by [disadvantaged] communities, or address[] a key factor that caused an area to be identified as a disadvantaged community.”¹ It also acknowledges that

¹ Draft Interim Guidance at pp. 1-2.

the *location* of a project is neither sufficient to determine that it provides a benefit to a disadvantaged community nor necessary to ensure that it provides such a benefit.²

The draft criteria in Appendix 1, however, predominantly boil down the evaluation of community benefits to geographic location. This approach has two major flaws: (a) under the Draft, virtually any investments within an identified disadvantaged census tract would count as a disadvantaged community benefit, regardless of the importance of the need addressed or accessibility to socioeconomically disadvantaged populations; and (b) many investments that would offer substantial benefit to disadvantaged communities are excluded because they are not adjacent to an identified census tract.

- a. ARB must require more than simply the location of a project within a disadvantaged community to count as a benefit to a disadvantaged community.

Location within a disadvantaged community alone should not be sufficient to qualify a project for the 10% funding set aside. Location alone does not guarantee that an investment will benefit disadvantaged residents. For example, a rail station may not produce a direct benefit for residents if the cost of transportation is out of their price range, or does not provide access to needed destinations. In fact, it could increase pollution burden by attracting more vehicles (passenger, medium, and heavy-duty) to drive into the area or by causing gentrification in areas without anti-displacement policies. To mitigate potential negative harms and to bring direct benefits to residents, the project should include community benefits such as affordable housing, local and targeted hiring, and or subsidize transit passes.

Yet, under the Draft Guidance, transit investments and many others appear to qualify toward SB 535 requirements without any further analysis beyond location.³ At the same time, we recognize that some investments do inherently provide meaningful benefits to disadvantaged communities by virtue of their geographic proximity to these communities. For example, urban trees planted in urban heat islands effectively mitigate that impact and bring benefits to local disadvantaged residents. ARB Guidance should require agencies to undertake careful analysis of projects both located in and immediately adjacent to disadvantaged communities to ensure the benefits flow to socio-economically disadvantaged residents.

- b. ARB should expand the “Provides Benefit To” criteria to include investments that benefit disadvantaged populations regardless of where they are located.

Conversely, some investments that increase the mobility of low income populations and offer them access to opportunity may provide significant benefits to disadvantaged communities regardless of their location. Disadvantaged households and populations are found in disadvantaged census tracts, along impacted corridors, in small neglected neighborhoods adjacent to more affluent communities and elsewhere. For example:

- Homes affordable to lower-income households benefit disadvantaged communities wherever they are built, as they increase choices, mobility, and access to opportunities for disadvantaged communities and households. This is already explicitly noted in the list of needs identified by community advocates (see item 8 on p. 17 of Draft Guidance), but is not included in the draft criteria for evaluating affordable housing projects (see p. 1-2 in Appendix 1). To provide these benefits, the housing need not be adjacent to a specific disadvantaged area. Occupancy preferences

²See *id.* at p. 11 (“Both of these approaches require that the project provide direct benefits to a disadvantaged community, regardless of location.”)

³Draft Interim Guidance Appendix 1 p. 1-1 (“Step 1”).

or tailoring new housing to meet needs specifically identified by disadvantaged communities could potentially be employed to strengthen this connection.

- Transit capital and operations funds invested along “impacted corridors” in addition to within ½ mile of a disadvantaged community can provide benefits to disadvantaged residents if fares and routes allow low-income people to access the transit lines. Similarly, transit passes or vouchers targeted to lower-income riders are a great method to reduce fares for transit’s core ridership, and provide a benefit to disadvantaged communities.

We recommend that ARB refine its definition of what it means to “provide a benefit to a disadvantaged community” to include benefits to disadvantaged households and populations.⁴ Doing so will help avoid the perverse outcome of causing GGRF transit and affordable housing investments to isolate, rather than benefit, low-income residents.

2. The Guidance Must Ensure that Projects Avoid Displacement and Other Burdens.

Investments that burden or displace disadvantaged communities do not benefit them. To put this principle into practice, the total benefit of a project should be described as its ‘net benefit,’ after taking a specified list of harms into consideration. A housing development proximate to a major freeway should require additional air quality mitigations. A new polluting facility should not be counted as a benefit to the local community unless it is replacing a dirtier land use.

Guarding against displacement is particularly important, as lower-income residents cannot enjoy benefits from investments that result in pricing them out of their homes.⁵ Anti-displacement protections are needed for *all* GGRF investments to ensure that the benefits of SB535 expenditures are not outweighed by displacement risks. Displacement from transit hubs disrupts and burdens low income people, transit’s core ridership, thereby undermining GHG reduction goals. We recommend that the “Requirements for all agencies that receive GGRF appropriations” on page 15 of the Draft Guidance include the following:

- No project should receive funding if it results in a net loss of units occupied by lower income households. If existing housing units are demolished or converted, they must be replaced on a 1-for-1 basis with units of comparable size and affordability, and displaced residents must be given the first opportunity to occupy those units.
- All funded stationary projects must be located in jurisdictions that have in place policies that protect against economic displacement of lower income residents⁶ or be income-qualified to ensure that most, if not all, project beneficiaries are lower-income (e.g. 100% affordable housing developments, low-income transit pass programs).

3. Investments that Provide Multiple and Cumulative Benefits to Disadvantaged Communities Should Be Prioritized.

We appreciate the language directing implementing agencies to score proposed projects higher if they leverage high benefits to disadvantaged communities.⁷ However, that language is not integrated into the

⁴ AB 1532, which applies to all GGRF funds, includes the goal that investments should be directed “toward the most disadvantaged communities *and households* in the State.” See Draft Interim Guidance at p. 5.

⁵ While we are pleased to see that the draft guidelines mention displacement with regard to the Sustainable Communities investment program, it is much too narrow to apply displacement protections only to this program and the requirement is vague.

⁶ A non-exhaustive list of anti-displacement policies is attached.

⁷ “When selecting projects for a given investment, give priority to those that maximize benefits to disadvantaged communities (e.g., use scoring criteria that favors projects with provide multiple benefits or the most significant benefits).” Draft Interim Guidance at p. 13. “[L]everaging across programs and collaboration among agencies can be

process outlined in Appendix 1, which instead would allow an agency to determine that a project qualifies for SB 535 if it meets any one of the broad eligibility criteria and says nothing about maximizing or multiplying benefits.

Eligibility criteria should be used to ensure each project meets minimum environmental, economic and public health requirements, while maximizing benefits. While ARB is still developing metrics for measuring benefits, we urge the agency to propose a process wherein projects that provide the most significant benefits receive funding priority. Even a system that required a minimum of two criteria be met at high levels, or three criteria met at medium levels, would likely ensure greater benefits.

Furthermore, ARB should increase the local and targeted hiring goals in the current criteria. Many Project Labor Agreements already require targeted hire thresholds exceeding 25%. Additionally, the criteria do not specify benefits associated with the provision of permanent jobs or contracting with disadvantaged business enterprises.

Finally, the eligibility criteria contained in the Guidance should not be exhaustive. ARB must allow additional flexibility for agencies to invest in projects that address needs and provide benefits identified by disadvantaged community residents and households.

Scoring and Ranking processes should be required in addition to eligibility criteria to ensure that benefits to disadvantaged communities are maximized. The extent of benefits that each project provides to low-income households should be scored and all projects ranked in a “performance management approach,” such as the one suggested by the Luskin Center and advocates.⁸ While the Draft Guidance states that agencies should use scoring criteria favoring projects that provide multiple significant benefits, the guidance currently does not direct or require agencies to accomplish this. The process, requiring only that implementing agencies check one box, risks relegating the provision of disadvantaged community benefits to a *pro forma* requirement. We recommend instead that ARB outline a process whereby each agency calculates a cumulative score based on how well several important indicators or eligibility criteria are met, thereby allowing agencies to make strategic investments and prioritize the most beneficial projects.⁹

Non-SB 535 funds. In addition to prioritizing the top tier of disadvantaged communities to receive the SB 535 set-asides, we recommend that ARB should give a second level of prioritization to next tier of disadvantaged communities, households and populations for the remainder of the GGRF monies, that is, non-SB 535 funds. This could be done by employing a ranking system similar to the one proposed for SB 535. Language could be added to page 15 to reflect this next level of prioritizing projects: “Target funding, to the extent feasible, for projects that benefit disadvantaged communities and households, whether or not these investments are within communities in the top tier of disadvantaged communities that qualify for SB 535 funding.” We recommend that ARB include a second tier of prioritization for investments that benefit:

- Census tracts with overall CES scores in the top 40%;
- Census tracts with an indicator in the top 40%, if the project will address that indicator; and
- Low-, very-low, or extremely-low income households, as determined by area median income (AMI).

used to help multiply the benefits of investments to achieve a transformative impact on these communities.” Draft Interim Guidance at p. 4.

⁸ Callahan & DeShazo, June 2014. Investment Justice through the Greenhouse Gas Reduction Fund: Implementing SB 535 and Advancing Climate Action in Disadvantaged Communities, UCLA Luskin Center for Innovation at pp. 16-17

⁹ *Id.* at p. 11 (“The investment options should then be evaluated based on how strongly they meet as many of the indicators as possible.”).

4. Projects that Authentically Include Disadvantaged Communities in the Planning, Implementation, Evaluation and/or Selection Process, Should Receive Funding Priority.

The Draft Guidance states that agencies must conduct outreach efforts for any investment to be located within, or provide benefits to, disadvantaged communities.¹⁰ The guidance on community outreach and engagement, however, is not adequately reflected in the criteria in Appendix 1. Community participation should be integrated into these criteria to ensure projects that authentically engage community participation during the development, selection or evaluation of projects receive priority. There is an important distinction between “outreach” and “engagement” or “participation.” ARB’s approach does not ensure that community participation will happen in an authentic and meaningful way. For example, engagement opportunities should be held at convenient times and locations, with child care and language assistance provided. We would like to see criteria that ensure implementing agencies engage disadvantaged community residents as early in the process for rolling out these funds as possible.

5. ARB Should Require Investments to Fulfill Either the 10% or the 25% Set-Aside, Not Both and Should Set Target Benefit Levels for All GGRF Programs.

SB 535’s intent is to ensure that GGRF investments achieve AB 32’s original mandates that investments are directed to disadvantaged communities, co-benefits to the state are maximized and efforts to improve air quality are complemented.¹¹ While SB 535 is somewhat ambiguous as to how its two set-aside categories should be calculated, accomplishing the overarching goal of maximizing benefits to disadvantaged communities is best accomplished by counting the 10% and 25% requirements separately so that disadvantaged communities benefit from at least 35% of GGRF funds. Ample evidence shows the disproportionate environmental health vulnerabilities facing low-income “communities that are already adversely impacted by air pollution.”¹² Meanwhile, these communities have been consistently overlooked as targets for beneficial investments and thus should receive priority for investments now. We are concerned that the Draft Guidance explicitly states that projects that are built within disadvantaged communities also count toward fulfilling the 25% benefit category.¹³ This effectively means that only an additional 15% of the funds are set aside to “provide benefits to” disadvantaged communities.

We would also like to see ARB set concrete SB 535 targets for more programs (Table 2 in the Draft Guidance is currently incomplete). Targets are necessary to ensure the SB 535 minimums are met and that agencies think critically about how to provide, leverage and maximize benefits to disadvantaged communities and households.

CONCLUSION

Thank you again for your dedication to ensuring that investments counted toward SB 535’s mandates meet the priority needs of socio-economically disadvantaged residents and households in California and provide *significant net benefits* by carefully avoiding foreseeable burdens.

Respectfully,

¹⁰ Draft Interim Guidance at p. 15.

¹¹ Health & Safety Code § 38565 (“direct public and private investment toward the most disadvantaged communities in California”); *Id.* at § 38501(h) (“maximizes additional environmental and economic co-benefits for California, and complements the state’s efforts to improve air quality”).

¹² *See id.* at § 38570.

¹³ Draft Interim Guidance at pp. 11, 20.

Miya Yoshitani, *Executive Director* & Mari Rose Taruc, *State Organizing Director*
Asian Pacific Environmental Network

Carl Anthony & Paloma Pavel, PhD, *Co-Founders*
Breakthrough Communities

Leonard Robinson, *Chair, Energy & Environment Committee*
California Black Chamber of Commerce

Amy Vanderwarker, *Co-Coordinator*
California Environmental Justice Alliance

Wendy Alfsen, *Executive Director*
California Walks

Robert Joe, *President*
Capell Valley Estates, Inc.

Katelyn Roedner Sutter, *Environmental Justice Program Director*
Catholic Charities, Diocese of Stockton

Tim Frank, *Director*
Center for Sustainable Neighborhoods

Robert Garcia, *Founding Director and Counsel*
The City Project

Bill Magavern, *Policy Director*
Coalition for Clean Air

R. Bong Vergara, *Director*
Conscious Youth Promoting Health & Environmental Readiness

Jeffrey Levin, *Policy Director*
East Bay Housing Organizations

Joy Williams, *Research Director*
Environmental Health Coalition

Noemi O. Gallardo, *Owner & Founder*
Gallardo Law & Policy Consulting

Vien Truong, *Environmental Equity Director*
The Greenlining Institute

Julie Snyder, *Policy Director* & Lisa Hershey, *Sustainable Communities Coordinator*
Housing California

Joshua Hugg, *Program Manager*
Housing Leadership Council of San Mateo

Seng Fong, *Executive Director*
Lao Iu Mien Culture Association, Inc.

Jill Ratner, *Program Director*
New Voices Are Rising Project

Marybelle Nzegwu, *Staff Attorney*
Public Advocates Inc.

Jodi Pincus, *Executive Director*
Rising Sun Energy Center

Tim Little, *Executive Director*
Rose Foundation for Communities and the Environment

Jeanie Ward-Waller, *California Advocacy Organizer*
Safe Routes to School National Partnership

Gordon Snead, *Director of Community and Economic Development*
Strength Based Community Change - Thrive LA

Peter Cohen & Fernando Marti, *Co-Directors*
SF Council of Community Housing Organizations

Jennifer Martinez, *Co-Director*
The San Francisco Organizing Project/Peninsula Interfaith Action

Annie Pham, *Policy Advocate*
Sierra Club California

Stuart Cohen, *Executive Director*
TransForm

Ellen Wu, *Executive Director*
Urban Habitat

Kemba Shakur, *Executive Director* & Kevin Jefferson, *Board Member*
Urban Releaf

Derecka Mehrens, *Executive Director*
Working Partnerships USA

Sample Local Anti-Displacement Policies

Direct Displacement

1. **One-for-one replacement** of all units occupied by lower-income households, including a) first right of return for displaced households, b) income levels affordable to displaced households, c) location within the same neighborhood, d) timely replacement of lost units, and e) comparable unit size.
2. **Relocation benefits** at the same level as required by the Uniform Relocation Act for households displaced by new development.

Economic Displacement

3. **Just Cause eviction** ordinance to protect tenants from arbitrary, discriminatory or retaliatory evictions while ensuring that landlords can lawfully evict tenants for a legitimate reason.
4. **Anti-harassment** ordinance to protect tenants from harassment and threats that amount to constructive eviction without ever taking formal eviction action.
5. **Rent stabilization** ordinance to protect existing tenants against rising rents that result from investment in TOD neighborhoods.
6. **Affordable housing and/or community stabilization impact fees** to ensure that private developers do their part to offset potential negative impacts of new construction.
7. **Jobs-housing linkage fee** to ensure that developers of commercial projects contribute to meeting the increased demand for affordable housing caused by attracting new workers.
8. **Relocation assistance** requirement to financially assist tenants who must move due to Ellis Act, condo conversion, or other no-fault evictions.
9. **Condominium conversion** restrictions to help protect the stock of existing rental housing, including limitations on the number of units that can be converted per year; relocation assistance for displaced tenants; and one-for-one replacement, inclusionary units, or fees to mitigate the loss of rental housing.
10. **Acquisition and rehabilitation** program to improve and preserve market rate affordable units as permanently affordable homes, including a tenant right of first refusal policy.
11. **“Source of income” non-discrimination** ordinance that prohibits discrimination against Section 8 voucher holders by landlords.
12. **Land banking** program, including dedication of publicly owned land, to preserve and protect parcels for affordable housing development.

August 20, 2014

VIA ELECTRONIC MAIL

Mary Nichols, Chair
California Air Resources Board

Dear Chair Nichols and Board Members:

We commend your staff for working to develop SB 535 guidelines. These guidelines will help ensure that implementing agencies determine which Greenhouse Gas Reduction Fund (GGRF) investments will truly provide benefits to disadvantaged communities. The SB 535 Coalition and our allies are dedicated to ensuring that environmental justice communities are an integral part of California's solutions to climate change. Investing GGRF funds to benefit disadvantaged communities is not only just, but a pragmatic strategy to maximize GHG emissions reductions.

Disadvantaged communities bear a disproportionate share of the burdens from greenhouse gas (GHG) and co-pollutant emissions. These underserved communities too often receive insufficient public resources to meet their needs, which include *reducing public health disparities, increasing household income, providing affordable housing, transit and energy options*, and *increasing access to opportunity*. ARB's SB 535 guidelines will be crucial to shifting the investment paradigm to meet the needs of disadvantaged communities, as the Legislature has directed.

We support the SB 535 Coalition's four-step framework (attached), because we believe it will help us achieve this outcome. Specifically, ARB's guidelines should require agencies to determine whether a proposed investment (a) addresses important needs of a disadvantaged community, (b) has a significant impact in meeting those needs, (c) targets its benefits primarily to socio-economically disadvantaged persons or households, and (d) avoids foreseeable harms.

As staff develops its interim Guidelines, we urge ARB to remember the following:

- (1) **Benefits should meet the needs of disadvantaged communities in a significant manner.** GGRF investments are critical for moving the needle toward improving socioeconomic and pollution indicators (such as those measured by the CalEnviroScreen). Some purported benefits are too remote or nominal to count towards SB 535's requirements. All credited disadvantaged community benefits should exceed a minimum threshold of significance to meet SB 535 requirements.
- (2) **A project's location in a disadvantaged community does not, by itself, ensure that the project will benefit that community.** A project's location can help determine who the primary beneficiaries are (e.g., weatherizing a low-income family's home, or providing a park in a low-income neighborhood). For some projects, however, location in a disadvantaged community should not be counted as a "benefit" to the community because the project does not benefit low-income residents, or demonstrates harms rather than benefits. One example could be a transit project that predominantly serves affluent riders but decreases the amount of affordable housing units in a disadvantaged

community). In addition, projects such as affordable housing and transit may provide great benefits to disadvantaged community residents despite being located in job-rich suburban areas with good schools and healthy environments, to which they provide low-income families access.

- (3) **Projects should avoid imposing burdens on disadvantaged communities.** ARB should identify key factors indicating adverse impacts for each project type, especially risk factors for displacement and the location of a project near harms such as toxic emissions sources. These factors should be weighed against benefit factors to inform an agency's decision whether the benefits provided are significant. For example, it is vital to avoid displacements to achieve SB 535's objectives. Low-income residents of neighborhoods near transit have the lowest VMT rates in the state, ride transit more than anyone else (even though most own or have access to cars), and tend to work, shop, play, and worship near where they live. Without safeguards in place, investment within disadvantaged communities can lead to displacement of current residents, relegating them to exurban areas far away from high-opportunity transit-connected neighborhoods, thereby increasing vehicle miles traveled and GHG emissions.
- (4) **Projects that authentically include disadvantaged communities in their planning, implementation, and evaluation process should be prioritized for funding.** SB 535 communities are typically underrepresented in the political process. Agencies should incentivize efforts to incorporate and be responsive to community voices.
- (5) **ARB's guidelines should ensure that disadvantaged communities benefit from at least 35 percent of GGRF funds.** SB 535 includes separate provisions for benefiting disadvantaged communities (at least 25 percent) and projects located within those communities (at least 10 percent). It also requires that funding guidelines developed for administering agencies "should maximize benefits for disadvantaged communities." Both to maximize benefits for disadvantaged communities, and to ensure that disadvantaged community residents receive more – not less – than their per capita share of GGRF spending, these two categories should be met individually and result in a total of at least 35 percent. Administering agencies should set targets for disadvantaged community benefits for the funding programs under their purview, to the extent that the budget does not already do so.

This is the first year of a new program. There will be intense public and political scrutiny of the projects that agencies claim as benefits to disadvantaged communities. It is necessary to have guidelines that prevent agencies from conducting a merely pro forma review, while clearly failing to provide meaningful benefits. Implementing agencies should give a higher score and rank to projects that demonstrate meaningful benefits to disadvantaged communities and residents when scoring all GGRF projects.

Respectfully,

Yvonne M. Williams, *President/Business Agent*
Amalgamated Transit Union, Local 192

Bonnie Holmes-Gen, *Senior Policy Director*
American Lung Association of California

Miya Yoshitani, *Executive Director*
Asian Pacific Environmental Network

Kirsten Schwind, *Director*
Bay Localize

Carl Anthony & Paloma Pavel, *Co-Founders*
Breakthrough Communities

Leonard Robinson, *Chair, Energy & Environment Committee*
California Black Chamber of Commerce

Amy Vanderwarker, *Co-Coordinator*
California Environmental Justice Alliance

Chuck Mills, *Program Manager*
California ReLeaf

Wendy Alfsen, *Executive Director*
California Walks

Bob Joe, *General Partner*
Capell Valley Estates

Katelyn Roedner-Sutter, *Environmental Justice Program Director*
Catholic Charities, Diocese of Stockton

Penny Newman, *Director*
Center for Community Action and Environmental Justice (CCA EJ)

Tim Frank, *Director*
Center for Sustainable Neighborhoods

Bill Magavern, *Policy Director*
Coalition for Clean Air

Marilyn Ababio, *Founder*
Comfort Homesake, Inc.

Bahram Fazeli, *Policy Director*
Communities for a Better Environment

D. Malcolm Carson, *Environmental Health Policy Director*
Community Health Councils

Phil Hwang, *Executive Director* & Daniel Saver, *Housing Attorney*
Community Legal Services in East Palo Alto

R. Bong Vergara, *Founder/Director* &
Rondine Macadaeg, *General Counsel & Director of Strategic Partnerships*
Conscious Youth Promoting Health & Environmental Readiness (CYPHER)

Shannon Baker-Branstetter, *Policy Counsel, Energy & Environment*
Consumers Union

Margaret Gordon, *Steering Committee*
Ditching Dirty Diesel Collaborative

Gloria Bruce, *Deputy Director*
East Bay Housing Organizations

Erica Morehouse, *Attorney* & Jorge Madrid, *Senior Partnerships & Alliances Coordinator*
Environmental Defense Fund

Kayla Race, *Policy Advocate*
Environmental Health Coalition

Celia Andrade, *Co-Chair*
Environmental Justice Committee, Asian Pacific Policy & Planning Council (A3PCON)

Noemi Gallardo, *Owner/Founder*
Gallardo Law & Policy Consulting

Simeon Gant, *Executive Director*
Green Technical Education & Employment

Gladwyn D'Souza, *Principal*
Green Youth Alliance

Vien Truong, *Director, Environmental Equity*
Greenlining Institute

Julie Snyder, *Policy Director*
Housing California

Joshua S. Hugg, *Program Manager*
Housing Leadership Council of San Mateo County

Antwi Akom, *Executive Director/Co-Founder*
Institute for Sustainable Economic, Educational and Environmental Design (I-SEED)

Seng Fong, *Executive Director*
Lao Iu Mien Culture Association, Inc.

Eric Bruins, *Planning & Policy Director*
Los Angeles County Bicycle Coalition

Remy De La Peza, *Senior Planner & Policy Counsel*
Little Tokyo Service Center

Jill Ratner, *Program Director*
New Voices Are Rising

Daniel A. Lashof, Ph.D., *Chief Operating Officer*
NextGen Climate America, Inc.

Alex Jackson, *Legal Director, California Climate Project*
Natural Resources Defense Council (NRDC)

Garry LaLonde Berg, *Chair*
North Bay Organizing Project -- Transit Riders United

Martha Dina Arguello, *Executive Director*
Physicians for Social Responsibility-LA

Marybelle Nzegwu, *Staff Attorney*
Public Advocates Inc.

Joel Ervice, *Associate Director*
Regional Asthma Management & Prevention

Jodi Pincus, *Executive Director*
Rising Sun Energy Center

Tim Little, *Executive Director*
Rose Foundation for Communities and the Environment

Jeanie Ward-Waller, *California Advocacy Organizer*
Safe Routes to School National Partnership

Jennifer Martinez & Erica Katske, *Co-Directors*
San Francisco Organizing Project/Peninsula Interfaith Action

Peter Cohen & Fernando Martí, *Co-Directors*
SF Council of Community Housing Organizations

Annie Pham, *Policy Advocate*
Sierra Club California

Cynthia Strathmann, *Executive Director &*
Lizzeth Henao Rosales, *Assistant Director of Equitable Development*
Strategic Actions for a Just Economy (SAJE)

Elsa Barbosa, *Campaign Director*
Strategic Concepts in Organizing & Policy Education (SCOPE)

Gordon Snead, *Director of Community and Economic Development*
Strength Based Community Change - Thrive LA (SBCC-Thrive LA)

Don Falk, *Executive Director & Hatty Lee, Community Organizing Manager*
Tenderloin Neighborhood Development Corporation

Robert Garcia, *Founding Director and Counsel*
The City Project

Joshua Stark, *State Policy Director*
TransForm

Ellen Wu, *Executive Director*
Urban Habitat

Kemba Shakur, *Executive Director & Kevin Jefferson, Board Member*
Urban Releaf

David W. Campbell, *Secretary-Treasurer*
United Steelworkers Local 675

Maria C. Gallardo, *Owner/Founder*
Voz Interpreting

Nicole Schneider, *Executive Director*
Walk San Francisco

Derecka Mehrens, *Executive Director*
Working Partnerships USA

Enclosures: (1) Disadvantaged Community Benefit Principles
(2) Determining Disadvantaged Community Benefits: Four-Step Framework

Cc: Air Resources Board members
Cynthia Marvin
Shelby Livingston
Monique Davis
Matthew Botill