

## **Member Organizations**

### **Amador Tuolumne CAA**

Amador, Calaveras, Tuolumne Counties

### **Campesinos Unidos, Inc.**

San Diego and Imperial Counties

### **Central Coast Energy Services**

Monterey, San Benito and Santa Cruz Counties

### **Central Valley Opportunity Center**

Stanislaus County

### **Community Action Commission of Santa**

#### **Barbara County**

Santa Barbara County

### **Community Action Marin**

Marin County

### **Community Action of Kern County**

Kern County

### **Community Action Partnership of Orange**

#### **County**

Orange County

### **Community Action Partnership of San**

#### **Bernardino County**

San Bernardino County

### **Community Resource Project, Inc.**

Sacramento, Sutter, Yuba, San Mateo Counties

### **Community Services and Employment**

#### **Training**

Tulare County

### **Economic Opportunity Council of San**

#### **Francisco**

San Francisco County

### **Fresno Economic Opportunity Commission**

Fresno County

### **Great Northern Corporation**

Siskiyou County

### **Inyo Mono for Community Action, Inc.**

#### **(IMACA)**

Inyo and Mono Counties

### **Kings Community Action Organization, Inc.**

#### **Kings County**

### **Maravilla Foundation**

Los Angeles County

### **MAAC (Metropolitan Area Advisory**

#### **Committee) Project**

San Diego County

### **North Coast Energy Services**

Mendocino, Solano, Yolo, Marin, Napa,  
Sonoma and Lake Counties

### **Pacific Asian Consortium in Employment**

Los Angeles County

### **Project Go**

Placer County

### **Redwood Community Action Agency**

Humboldt, Del Norte, Modoc Counties

### **Self Help Home Improvement, Inc.**

Shasta and Tehama Counties

### **Spectrum Community Services, Inc.**

Alameda County

### **TELACU (The East Los Angeles Community**

#### **Union)**

Los Angeles County



## **Association of California Community and Energy Services**

### **Mission Statement**

To Promote a Statewide agenda to assist low-income families  
by strengthening our member organizations that provide  
services to their communities.

## **Public Comments of the Association of California Community and Energy Services (ACCES) Regarding the Use of Cap-and-Trade Auction Proceeds In Disadvantaged and Low-Income Communities To Implement Senate Bill 535 (De Leon 2012) and Assembly Bill 1550 (Gomez 2016)**

The members of the Association of California Community and Energy Services (ACCES) are pleased to have the opportunity to offer comments and recommendations on the use of Cap-and-Trade auction proceeds in Disadvantaged and Low-Income communities. We are encouraged to see that the scope of services provided under the Cap-and-Trade program is being expanded to areas beyond the originally designated Disadvantaged Communities (DACs) per AB1550.

ACCES strongly supports the delivery of services to the DACs but the highly restrictive nature of the original plan falls short by not allowing for the full participation of low-income communities throughout California to receive the benefits of the Green House Gas Reduction funds. We were in full support of AB 1550 because of its efforts to expand the reach of the program to not only DAC adjacent low-income communities, but to all low-income households in need.

We would like to offer our comments and recommendations on the key questions posed at the hearing as follows:

### **1. How should we identify disadvantaged communities, low-income communities, and low-income households for the purpose of AB 1550 and California Climate Investments?**

We strongly recommend designating the top 30% highest scoring census tracts in the CalEnviroScreen 3.0 as disadvantaged communities. It is our position that this approach is in alignment with the intent of AB 1550 and would allow for a significantly increased level of participation in the program by the low-income households within one-half mile of a disadvantaged community pursuant to AB 1550. Although low-income households may live in low pollution burden communities, this does not mitigate other socioeconomic impediments that contribute to this vulnerable population's problems. We strongly urge CalEPA and CARB to increase program participation eligibility to the top 30% highest scoring census tracts in CalEnviroScreen 3.0 as a criterion for designating a Disadvantage Community.

We support using both definitions provided by AB 1550 to determine the eligible communities and households for a minimum of 10% of the GGRF funds. Utilizing both definitions will facilitate a greater reach into these communities for the benefit of all.

In regards to establishing eligibility, we recommend you to use an applicant's involvement in other public benefit/assistant programs such as CalFresh, TANF and Medi-Cal services to establish categorical eligibility. If an applicant does not currently participate in a public benefit program, we then recommend the use of an income verification application to ensure eligibility.

**2. Projects must be located within one of the AB 1550 areas to count toward investment minimums. How do we describe this requirement for projects that do not neatly fit into defined community boundaries?**

We recommend that allowances be made for projects that may not be physically located within a DAC but may still benefit the low-income community such as a community solar project. Although these projects that may be located outside of an identified community boundary, we suggest that the percentage of those benefits contributed to the project be left up to the designated state agency funding the projects within their grant's scope.

We recommend that the funding should not require that a set percentage of the project be physically located within a DAC/low-income community boundary as noted earlier with the community solar project. The land to house the solar project, may be located outside of the designated community lines but the power generated from the panels do benefit the community.

**3. Projects must provide direct, meaningful, and assured benefits to residents of identified communities or to low-income households. Should we consider benefits to a low-income community to be the same as benefits to a disadvantaged community?**

We recommend using the same approach and criteria to evaluate the project benefits located within low-income communities as that of the DACs, in keeping with the AB 1550 targets. It is essential to have the same benefits extended across all communities.

In closing, we would like to thank CARB and CalEPA for allowing us the opportunity to offer comments and recommendations on the use of Cap-and-Trade auction proceeds in Disadvantaged and Low-Income communities to implement Senate Bill 535 (De Leon 2012) and Assembly Bill 1550 (Gomez 2016).

If we can be of further service, please free to contact Melissa Smith at [msmith@accesadmin.com](mailto:msmith@accesadmin.com).

The Association of California Community and Energy Services (ACCES) is a statewide association of human and energy service providers engaged in energy efficiency, solar and empowering low-income communities.

Respectfully submitted on February 21, 2017 by,

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