

November 20, 2015

Chairwoman Mary Nichols
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments on Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Dear Chairwoman Nichols, Board Members, and Staff:

On behalf of residents from disadvantaged communities in Fresno and Kern Counties, we thank you for the opportunity to provide comments on the Draft Cap-and-Trade Auction Proceeds Second Investment Plan (“Plan”). We are especially grateful that the public workshop held in Fresno on November 4, 2015, allowed for our participation, as many of us are monolingual Spanish speakers or have limited English proficiency. Through this letter, we hope to guide the California Air Resources Board (“CARB”) and other administering agencies as they direct Cap-and-Trade Auction Proceeds to better prioritize investments to benefit disadvantaged communities in the San Joaquin Valley.

Workforce Opportunities

We understand the benefit of investing in renewable energy, including solar power. We hope that solar companies that receive Auction Proceeds to support projects in disadvantaged communities are required to hire locally. When solar panels replace agricultural jobs, job training and local hiring is especially important to ensure that displaced workers have job opportunities.

Short-Lived Climate Pollutants and Environmental Quality

We are concerned about the odor emitted from dairies and chicken coops in addition to climate impacts of those facilities. Also, fecal matter from these facilities is contaminating the water, which not only affects their access to safe drinking water, but also contaminates the food grown nearby. Auction Proceeds should be used to support installation of filters by dairies and chicken coops in order to reduce air contaminants and foul odors emitted from these facilities. There should also be mandatory air and water protection standards for any facility that receives auction proceeds.

More regulations must be placed on existing dairies, rather than solely on new and expanding dairies to reduce methane gas emissions and other contaminants. These regulations must be mandatory for *all* dairies, not voluntary as suggested in CARB’s new strategy plan for reducing methane gas emissions.

Transportation

CARB must fund research on green alternatives to transportation, including school buses. For example, Reedley, a city in Fresno County, recently implemented pilot programs for green school buses funded by auction proceeds. Programs like Reedley’s should be replicated.

We recommend CARB prioritize rural vanpool projects and incentivize carpooling in rural areas. The lack of access to reliable transportation makes it extremely difficult for residents in disadvantaged rural communities go to their doctor appointments, grocery stores, school, and work.

Generally, transportation options are limited for those living in the rural San Joaquin Valley. We encourage CARB to incentivize and facilitate transportation accessibility in these disadvantaged communities through investments in infrastructure, frequency, and routes.

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Questions or concerns regarding this comment letter may be addressed to Kaylon Hammond, Policy Coordinator, Leadership Counsel for Justice and Accountability, at khammond@leadershipcounsel.org or (559) 369-2790.

Sincerely,

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