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SOUTHERN
CALIFORNIA
ECUMENICAL
COUNCIL

March 8, 2013

California Air Resources Board
Post Office Box 2815
Sacramento, California 95812
Attn: Chairman Mary Nichols

RE: Comments on ARB's Investment Plan for Cap-and-Trade Revenues

Dear Chairman Nichols and ARB Board Members,

As a coalition of California faith organizations, thank you for the opportunity to submit these comments regarding the development of ARB's Investment Plan for revenue of cap-and-trade revenues. As communities of faith committed to the health of all of Creation, we are encouraged by California's leadership in climate and energy policy, particularly as regards AB 32. In addition to the common tenet of stewardship, all major faith traditions also share the principle of caring for those most vulnerable in our society, whether due to economic hardship or problems related to health. To this end, we are also encouraged by the passage of SB 535, which requires 25 percent of the expended revenues of the cap-and-trade portion of AB 32 be directed to benefit disadvantaged communities, and at least 10 percent of the expended proceeds be invested in regional community projects.

We agree with the draft investment principles released in the ARB Concept Paper on the Cap-and-Trade Proceeds Investment Plan and would like to suggest a few projects that both conform to your draft principles and encompass our commonly shared faith values.

First, enhance job creation in communities hard hit by high rates of unemployment and poor air quality by retrofitting older, energy-inefficient buildings with energy- and water-efficient measures, and by adding renewable, on-site electricity generation. The state could build on already-existing clean job training programs, such as Homeboy Industries Solar Program and Solar Richmond. By targeting the state's large stock of older, inefficient public buildings, people trained by these programs would have projects waiting for them in which to put their skills to work. In addition to quickly reducing emissions, these projects would have co-benefits of improving the health of people who work in and use these buildings as the retrofits often improve ventilation and air quality, and remove toxic materials. An added plus is that these retrofits would save the state or local agency money on energy bills.

We suggest that non-profits, such as congregations, be eligible for this funding as well, since houses of worship are often older and in need of energy-efficiency improvements and house important ministries serving the public. We suggest making investment money available for solar retrofits, supplemented with battery back up for nonprofit community centers or religious buildings that would serve as cooling centers on extreme heat days.

Second, invest in public transit, especially in underserved areas. As you point out in the concept paper, transportation is the largest contributor to GHG emissions in the state and reducing emissions from transportation should be a top priority. We agree, and believe that investment in public transit and alternatives to oil must be prioritized. Accessible and affordable mass transit is an environmental justice issue. Those who rely on public transportation too often are shut out of job opportunities, or spend many hours in long and circuitous bus routes to and from work. With targeted funding and collaboration with local transit agencies, transit systems could be much better connected and integrated, reducing pollution and traffic, fostering economic development, and improving people's quality of life.

Third, enhance community development by restoring and developing more green spaces, especially near low-income housing and transit hubs. Trees and green spaces absorb CO₂ and reduce the urban heat island effect. This could include the restoration of nearby parks and community gathering areas. It would also help to integrate areas in which people live, transit and play, increase transit use, as well as the safety and sense of community.

Many of us in the faith community have seen first-hand how investment in the clean energy economy, transit, and neighborhood development revitalizes communities, in social, economic and health terms. With the Air Resources Board's investment plan, we again have an excellent opportunity to lead the nation by example in job creation, carbon pollution reduction, and protection of the health of our community members.

Thank you for your consideration.

Sincerely,

Susan Stephenson, Executive Director
California Interfaith Power & Light

Margaret Henke and Sherri Loveland, Co-Chairs
Orange County Interfaith Coalition for the Environment

Betsy Reifsnider, Environmental Justice Director
Catholic Charities, Diocese of Stockton

Bhawana Kamil, President
Muslim American Society Bay Area

Mark Carlson, Director
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Rev. Albert G. Cohen, Executive Director
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