Ms. Mary Nichols  
Chair  
California State Air Resources Board  
1001 I Street  
Sacramento, California  

Re: Air Resources Board (ARB) Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan (Fiscal Years 2016-17 through 2018-19) (“Concept Paper”)  

Dear Chair Nichols and Air Resources Board Members,  

Thank you for the opportunity to comment on the Concept Paper.  

California's state-certified community (“local”) conservation corps work to help the state meet its environmental targets while providing job training and workforce development opportunities to residents of disadvantaged communities and others, such as at-risk youth and veterans, who face barriers to employment.  

We've attached additional information on our program and offer the following recommendations for strengthening the investment plan to benefit the populations we serve:  

1. **Benefits for All Californians** (beginning on page 4): To ensure that residents of disadvantaged communities and others facing barriers to employment are not excluded from job creation benefits, we recommend ARB prioritize emissions-reduction projects that “use the services of state-certified community conservation corps or other community-based nonprofit organizations that provide job training opportunities for residents of disadvantaged communities, veterans, former foster care recipients, or at-risk youth.”  

2. **Integrated Projects in Disadvantaged Communities to Support Local Climate Action** (beginning on page 5): We recommend that any concentrated investment made through “integrated projects” include workforce development, job training, and employment opportunities for residents of the communities in which projects occur.  

3. **Rural Communities and Small Businesses** (beginning on page 6):  

We look forward to working with the ARB to ensure that all Californians benefit from the proceeds of the cap-and-trade program.
7): We recommend integrating state and local conservation corps crews that already work with small businesses and in rural areas into new programs (compost deployment, woodstove replacement, food waste or compost collection, etc.).

4. **Natural Resources and Waste Diversion** (beginning on page 18): State-certified community conservation corps have decades of successful experience working alongside state and local partners to help achieve natural resources and waste diversion targets while job training and employing residents of disadvantaged communities, veterans, and at-risk youth. As ARB recognizes, “Operating the next generation of composting and anaerobic digestion plants will require new skills, and where applicable, job training for community residents.” We recommend ARB prioritize projects and investments that include state-certified conservation corps to ensure job-training benefits are realized.

California’s state-certified community conservation corps are ready to help ensure that investments provide strong environmental benefits to all communities and provide lasting job training and employment opportunities to the most vulnerable residents of our state.

ARB’s inclusion of a robust job training and workforce development component would better uphold the state’s climate laws and would ensure that those facing obstacles to employment don’t miss a needed opportunity.

Let’s get to work.

Sincerely,

Alan Lessik
President
California Association of Local Conservation Corps
California’s State-Certified Community Conservation Corps

Put Climate Investments to Work

Job training and workforce development opportunities for those facing barriers to employment

What We Do
California’s state-certified community conservation corps job train residents of disadvantaged communities and others, such as veterans and at-risk youth, on emission-reducing projects that benefit all Californians.

Corpsmembers have a variety of unemployment backstories – high school dropouts, formerly gang-involved, homeless, former foster care recipients, out of work veterans, or otherwise underserved. All are at the Corps to engage in professionalism, education, and hard work that will better themselves and their community.

At the Corps, those facing barriers to employment participate in job training programs that include industry-recognized credentials or certifications. These programs lead to increased job readiness, quality jobs, more economically stable families, and ultimately stronger and safer communities.

Proven State Partnerships
We’ve worked for decades alongside government partners to achieve important state priorities. Examples include:

CalRecycle: Legislation provides corps annual funding to assist the state to meet its recycling targets and provide recycling services and benefits to disadvantaged communities.

CalTrans: Legislation requires use of corps on Active Transportation Program grant projects whenever feasible.

Proposition 1: This voter-approved bond encourages the use of corps and requires use of corps on all state agency bond-funded ecosystem protection programs where feasible.

Expert Emissions Reduction Work
Corps have successfully completed thousands of emissions-reducing projects.

Samples of our work include solar installation; home weatherization; construction of bike lanes and other low-carbon or active transportation projects; wetlands and other habitat restoration; turf removal and drought-tolerant landscaping; waste diversion and composting services; urban forestry and forestry health.

Let’s Put Climate Investments to Work
There’s lots of work to be done and we can help -- with your support.

Please help ensure that investments provide strong environmental benefits to all California communities and provide lasting job training and employment opportunities to the most vulnerable residents of our state.