



July 23, 2018

Chair Mary Nichols and Members
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted Via Electronic Submission Form

Comments on July 2 Proposed GGRF Funding Guidelines

Dear Chair Nichols and Board Members:

Since 2014, CARB has led the nation in guiding investments to underserved and overburdened communities that “meaningfully address an important community need” identified by the true experts: the residents of the community themselves. The undersigned members of the California Climate Equity Coalition (formerly the SB 535 Coalition) commend staff’s continued inclusion of this strong language in the 2018 Guidelines update and write to urge you to amend the draft to actualize this commitment more fully.

We also commend staff’s restoration in the July 2 Proposed Funding Guidelines of the strong requirement that implementing agencies “must consider whether a given project type has the potential to result in substantial economic, environmental, and public health burdens (e.g., physical or economic displacement of low-income residents and businesses, increases of criteria or toxic air pollutants) in disadvantaged communities and low-income communities, and design programs in such a way as to avoid potential substantial burdens.” (pp. 11, 16) Unfortunately, staff has not also restored specific language in the current Guidelines that specifies, among the burdens that must be avoided, “physical or economic displacement of disadvantaged community residents and businesses or increased exposure to toxics or other health risks.” (Dec. 2015 Funding Guidelines, p. 2-12) **This language, too, should be added back into the Guidelines you adopt; and the Evaluation Criteria should incorporate the requirement to “avoid harms.”**

In addition, we request two other changes:

1. Require project sponsors and administering agencies to identify the “important community need” that the project proposes to “meaningfully address”

We commend the strong language in the July 2 Proposed Guidelines that continues to direct administering agencies to “evaluate whether the project provides a benefit that meaningfully addresses an important community or household need.” (p. 49) For an investment in a disadvantaged or low-income community to “meaningfully address an important community need,” however, the project sponsor and administering agency must first determine -- from the community, wherever possible -- what the relevant “important community need” is that the project will “meaningfully address.”

Given the need to *determine* that “important community need,” and the requirement that “Administering agencies must provide transparency and accountability in program implementation and estimated project outcomes” (pp. 11, 17), the Guidelines should expressly require project sponsors to *articulate that important need in a sentence or two*.

This modest change will add no burden to project sponsors who, having already determined the important community need their project will meaningfully address, would simply have to state that need in a sentence or two. On the other hand, the benefits will be enormous, as ARB’s systematic collection of this information will enable it to make it publicly available, giving the very communities that AB 1550 requires these investments to benefit the transparency the Guidelines already require, and allow them the opportunity to ensure that decisions are accountable to their engagement in the process, as the Legislature intended.

We acknowledge staff’s addition, in step 3 of the three-step evaluation process, of a requirement that “The benefit provided must directly address the need identified in Step 2.” (p. 52) This language would fully address our request if included in the Evaluation Criteria and amended to read: “The benefit provided must directly address the need identified in Step 2, *and the applicant must specify the important community or household need the project will meaningfully address.*”

2. Require that project applicants demonstrate how the project will deliver job/training benefits to priority community residents.

Where projects are counted toward AB 1550 based on job and training benefits for lower-income residents, the expectation benefits will reach those residents must not be assumed. Rather, project applicants should be required to demonstrate concrete actions that will be taken to deliver those benefits to the target population.

To that end, we believe ARB’s Funding Guidelines should include a provision that states:

“Explain both how the investment will result in economic development via the creation of high-quality jobs and/or job training benefits, and what steps will be taken to ensure that a majority of those jobs, and those training benefits will be delivered to lower-income residents.”

This provision should go on to include language in the draft Transformative Climate Communities (TCC) program guidelines on Economic & Workforce that requires TCC funds to

“be used to develop local, high-quality jobs that offer living wages, benefits, worker voice, predictable scheduling, and opportunities for advancement, with clear on-ramps for low-income residents in and near the Project Area.” (p. 18 Draft 2018 Guidelines.)

Very truly yours,

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