September 1, 2015

Chairman Mary D. Nichols  
Executive Officer Richard Corey  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Subject: SUPPORT Cap-and-Trade Investment for California Businesses in the GGRF Investment Plan

Dear Chairman Nichols and Executive Officer Corey:

Thank you and the other State agencies for the hard work developing the Cap-and-Trade Auction Proceeds Triennial Investment Plan. On behalf of the Cleaner Air Partnership, we are writing in support of furthering the investments and adding new programs for California businesses as referenced in the Draft Concept Paper for the Second Investment Plan. Concepts such as efficient financing, addressing short-lived climate pollutants, and providing more opportunities for small businesses to participate will have a positive effect on reducing greenhouse gas emissions, improving air quality and public health, and enhancing economic growth.

Efficient financing mechanisms, such as revolving loan funds, loan guarantees, credit enhancements and a clean energy financing center, will expand the opportunity for businesses in California to invest in clean energy solutions, including energy efficiency projects, electric vehicles and cleaner fleets. Financing options will help maximize investments, stretching public dollars further through engaging private capital in financing opportunities.

Investments to reduce short-lived climate pollutants, including F-Gases and black carbon, will help California businesses improve energy efficiency and enhance the business bottom line through energy savings. For example, offering incentives to transition to refrigerants with low-Global Warming Potential (GWP) will help businesses more quickly transition from systems that use high-GWP refrigerants and will also help businesses reduce energy use and lower electricity bills. In the transportation sector, investments in new freight strategies and expanding programs that support businesses in transitioning fleets to cleaner diesel and alternative fuel technologies are imperative to reducing black carbon. Reductions in black carbon from the transportation sector will improve help improve health and air quality. This is of particular importance in the Greater Sacramento Region where over 70 percent of the region’s air quality issues are attributed to mobile sources of pollution.

Finally, we applaud the concept of providing more opportunities for small businesses to assist in advancing the State’s climate mitigation efforts, which could bring forward economic and health

The Cleaner Air Partnership is a joint project of Breathe California, the Metro Chamber, and Valley Vision helping the greater Sacramento region meet clean air standards to protect health and promote economic growth.
benefits. As mentioned in the draft Investment Plan, across the state, small businesses represent half of the State’s private sector labor force. This statistic is even more pronounced in the Greater Sacramento Region where nearly 80 percent of the private sector jobs are attributed to businesses with fewer than 250 employees\(^1\). Improving the opportunity through financial support and incentives for small businesses to implement energy efficiency projects, install renewable generation and transition to cleaner fuels and vehicles will enhance the resiliency of individual businesses and the resilience of the Region’s economy as a whole. Moreover, these investments will contribute to reducing greenhouse gas emissions, improving air quality and enhancing public health.

Sincerely,

Kori Titus, CEO
Breathe California of Sacramento-Emigrant Trails

Bill Mueller, Chief Executive
Valley Vision

Peter Tateishi, President & CEO
Sacramento Metro Chamber

\(^1\) California Economic Development Department, 2012.