

March 8, 2013

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Roxana Tynan

Ms. Mary Nichols
Chair, California Air Resources Board
1001 I Street
Sacramento CA 95814

Dear Chairperson Nichols and Board:

We support investing cap-and-trade revenues to help California achieve its AB 32 and SB 375 goals equitably and effectively, as well as address job standards, and workforce integration and development.

LAANE is an advocacy organization dedicated to building a new economy for all. Combining dynamic research, innovative public policy and the organizing of broad alliances, LAANE promotes a new economic approach based on good jobs, thriving communities and a healthy environment.

LAANE played a pivotal role in the passage of sweeping anti-pollution and anti-poverty measures, which include:

- Advocating for the passage and implementation Clean Trucks Program for the region's ports to get dirty trucks off the road and improve the quality of life for industry's truck drivers,
- Increasing energy efficiency offerings at the Los Angeles Department of Water and Power to expand our renewable energy infrastructure and
- Improving recycling while reducing truck pollution at the Department of Sanitation, and
- Advocating for the passage of a Construction Careers Policy the Los Angeles County Metropolitan Transportation Authority to ensure that transportation development reduces congestion and creates middle-class construction careers for disadvantaged communities.

As part of the AB 1532 implementation strategy, SB 535 (de Leon) requires that 25 percent of the Cap and Trade Fund go towards projects that would benefit areas disproportionately affected by pollution and suffering from high concentrations of unemployment, low levels of educational attainment, among other socio economic factors. In addition, at least 10 percent of the Fund must be allocated to projects in disadvantaged communities for programs to reduce pollution and develop clean energy.

Based on our experience, we want to emphasize the need for:

- 1) Programs and initiatives that create real career opportunities that provide family-supporting wages for workers,
- 2) Safe employment and quality projects through the usage of responsible contractors and the employment of apprentices and skilled journeypersons on construction projects,
- 3) Safeguards to ensure that funds are used responsibly and do not inadvertently reward bad actors. For instance, the Prop 1B Goods Movement Emissions Reduction Program provided grants to port trucking companies to subsidize the purchase of new trucks, and



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simultaneously required the grantee to pass along the benefit of the grant to any lessee of the grantee.

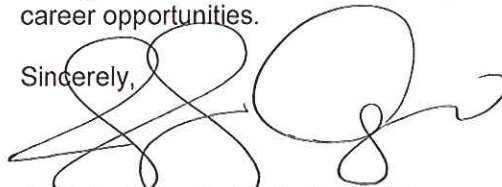
- 4) Effective tracking of outcomes for how successful these investments are in setting individuals into middle-class career paths, not just one-off, pilot programs that do not provide long-term opportunities in the areas of sustainable construction, energy efficiency and renewable energy infrastructure for disadvantaged communities.

In addition, we have the following feedback on programs for potential investment that complement investments in transportation, energy efficiency, and recycling.

- 5) Continue to support direct and ongoing incentives for recycling market development (i.e. the Recycling Market Development Zone), and for composting and digestion facilities. Immediate investments in organics processing and recycling infrastructure will reduce landfill methane emissions, improve the domestic recycled-content manufacturing of materials, and, by re-introducing discards into the manufacturing process, will create more local jobs by keeping recycled materials on our shores and directly supporting California processing and manufacturing with recycled feedstock.

We hope that the agency takes these recommendations seriously and develops a program for the region that improves the quality of life of working families through effective infrastructure investment and the creation of good middle-class career opportunities.

Sincerely,



Jackelyn Cornejo, Project Director
Los Angeles Alliance for a New Economy (LAANE)