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Roxana Tynan

September 1, 2015

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

Dear Ms. Nichols:

Re: Comments on the Draft Second Investment Plan Concept Paper for California Climate Investments

Thank you for the opportunity to submit comments on the Draft Second Investment Plan Concept Paper. The Los Angeles Alliance for a New Economy is a non-profit organization that for more than two decades has successfully advocated for policies and projects that promote thriving communities, environmental benefits and good jobs. We have worked in coalition for policies and programs to raise living standards, create career opportunities, improve communities and reduce Greenhouse Gas emissions and toxic pollution. This includes our work to clean up the trucks at the Ports of Los Angeles and Long Beach, to expand investment in energy efficiency and solar programs at the Los Angeles Department of Water and Power, and to increase recycling in the City of Los Angeles. We believe that our state's transition to a clean energy economy can and should be tied to the creation of good, middle class jobs that can support families and build strong communities.

We are interested in the Energy Efficiency and Renewable Energy components of the Draft Second Investment Plan. This is due to our long-standing partnership with the Los Angeles Department of Water and Power and IBEW Local 18 to develop programs that provide the triple benefit of reducing Greenhouse Gas emissions, benefitting low income communities through lower utility bills and providing high quality training and employment opportunities to disadvantaged communities.

We are particularly proud of our work with the Utility Pre-Craft Trainee program. Trainees are paid \$16 per hour while they gain the experience to access careers in the utility industry. Very few training programs offer this earn-as-you-learn approach that is essential to maximizing benefits for disadvantaged communities. This program's trainee workforce reflects LA's ethnic diversity, has a large percentage of women and a majority of participants report a barrier to employment such as a criminal conviction, long-term unemployment or being a single parent. We feel that this incredibly successful program has a role to play in ensuring monies invested from the GHGRF maximize benefits to disadvantaged communities.

Given this experience, we respectfully offer some suggestions for changes to the Draft Second Investment Plan:

- The section that addresses disadvantaged communities under Energy Efficiency and Renewable Energy (pg. 16), mentions "household clean energy generation", but does not include renewable energy generation projects that are community based and not household based. It is essential that this definition be expanded to include community based energy generation projects as they have the potential to reach residents who do not meet requirements for household based systems. Household clean energy generation is important, but it makes sense to define projects as widely as possible in the Investment Plan. This will ensure that all innovative projects that provide the highest reduction in GHG emissions and the best benefits to disadvantaged communities are eligible.

An example of this exciting opportunity is the 40MW Community Solar Program currently being developed by the Los Angeles Department of Water and Power. Developed on public land, these projects have the potential to bring solar power and reduced energy bills to households locked out of the current residential solar model like some renters and those whose homes do not qualify. This is especially important because many residents in disadvantaged communities do not own their home. A coalition of more than 30 community, labor and environmental organizations, including LAANE, IBEW Local 18, SCOPE, Communities for a Better Environment and Sierra Club, supports such a program and is working to ensure that it truly serves disadvantaged communities.

- Similarly, Figure 5, which describes "Draft Investment Concepts" under Energy Efficiency and Renewable Energy (pg. 17), also focuses on residential projects. Again, this excludes the exciting potential to create community renewable energy projects. Many of these community renewable energy projects can be located in disadvantaged communities, employ the residents of these communities in projects that are visible to them and benefit the neighbors of the project with reduced energy bills.
- Another recommendation involves the reference to "clean energy manufacturing and service jobs" in section 5, "Co-Benefits" (pg. 16). Rather than simply referring to "jobs" as a co-benefit, we would like to recommend using language that prioritizes high-quality jobs. In addition, we recommend language that supports providing access to these high-quality jobs to residents of disadvantaged communities.

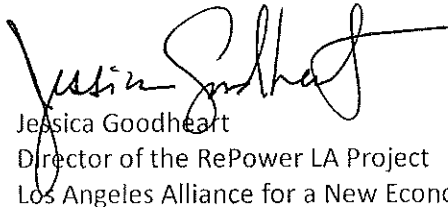
- The money allocated for energy efficiency and solar in municipal, university, school and hospital buildings offers one of the best opportunities to provide high quality job opportunities for disadvantaged communities while reducing energy use and greenhouse gas emissions. For this reason, we feel the current funding for energy efficiency for public buildings, set at only \$20 million per year, should be increased and be made available for all types of public buildings, not just state-owned buildings.

We appreciate your consideration of these comments. We look forward to working together in the future to develop exciting and innovative approaches to a clean energy future that benefits all Californians.

Sincerely,

A handwritten signature in black ink, appearing to read 'Roxana Tynan', with a large, stylized loop at the end.

Roxana Tynan
Executive Director
Los Angeles Alliance for a New Economy

A handwritten signature in black ink, appearing to read 'Jessica Goodheart', with a large, stylized loop at the end.

Jessica Goodheart
Director of the RePower LA Project
Los Angeles Alliance for a New Economy