



California's State-Certified Community Conservation Corps

CONSERVATION  
CORPS OF LONG  
BEACH

November 12, 2015

CIVICORPS (EAST  
BAY)

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

EOC / FRESNO  
LOCAL  
CONSERVATION  
CORPS

LOS ANGELES  
CONSERVATION  
CORPS

**Re: Air Resources Board (ARB) Draft Cap-and-Trade Auction Proceeds Second Investment Plan (Fiscal Years 2016-17 through 2018-19) ("Draft Investment Plan")**

CONSERVATION  
CORPS NORTH BAY

Dear Chair Nichols and Air Resources Board Members,

ORANGE COUNTY  
CONSERVATION  
CORPS

Thank you for the opportunity to comment on the Draft Investment Plan.

SACRAMENTO  
REGIONAL  
CONSERVATION  
CORPS

California's state-certified community ("local") conservation corps have for decades successfully partnered with the state to achieve environmental targets while providing job training, workforce development, education, and job placement opportunities to unemployed residents of disadvantaged and underserved communities.

SAN FRANCISCO  
CONSERVATION  
CORPS

URBAN  
CONSERVATION  
CORPS OF THE  
INLAND EMPIRE

We've attached additional information about our long-standing and proven programs and offer the following recommendations for strengthening the Draft Investment Plan to benefit the California communities we serve:

SAN JOAQUIN  
REGIONAL  
CONSERVATION  
CORPS

1. *Environmental and Economic Benefits for All Californians:*  
We applaud ARB's efforts to ensure benefits to California's disadvantaged communities per CalEnviroScreen, which classifies one-quarter of California's population as living in affected communities. We believe that at least one-quarter of the climate funds should be invested in those census tracts. However, we know acutely from our program work that many of California's most unemployed, vulnerable and underserved communities fall outside CalEnviroScreen designation and could benefit significantly from GGRF investments in urban forestry, low-income weatherization, active transportation, and

SAN JOSE  
CONSERVATION  
CORPS

SEQUOIA  
COMMUNITY CORPS  
(TULARE)

URBAN CORPS  
OF SAN DIEGO  
COUNTY

other programs. With constrained fiscal resources, the State can and should take advantage of every opportunity to lift Californians out of poverty. State agencies should be strongly encouraged to craft programs that include nonprofit organizations and community groups to create long-term environmental and economic benefits locally that reverberate statewide. To ensure that unemployed residents of all underserved communities are not excluded from job creation benefits, we recommend ARB encourage State agencies to 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 unemployed residents of disadvantaged and underserved communities, including veterans, former foster care recipients, or at-risk youth.”

2. *Workforce education and training investments* (page 24-25): We recommend ARB articulate how “recommended investment priorities provide opportunities for workforce education and training programs that connect individuals in disadvantaged communities to good jobs to build or operate projects that reduce GHG emissions” and how community stakeholders can become active participants in the work “to identify effective workforce models and develop common principles to guide workforce education and training investments.” We recommend that ARB cite state-certified community conservation corps as a proven model that connects State agencies, local communities and California’s unemployed to achieve emissions-reducing environmental projects that benefit families, underserved communities and the State.
3. *Integrated Projects in Disadvantaged Communities to Support Local Climate Action* (page 28): We recommend that any concentrated local investment made through integrated projects include workforce development, job training, education and placement opportunities for unemployed residents of the communities in which projects occur.
4. *Natural Resources and Waste Diversion* (page 47): 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 and underserved communities. 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 more 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,

A handwritten signature in blue ink that reads "Alan Lessik".

Alan Lessik  
President  
California Association of Local Conservation Corps