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February 25, 2013

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

RE: Investment plan for cap and trade auction revenues

Dear Chair Nichols:



Affirmed Housing Group is one of more than 40 organizations that has signed on to the Sustainable Communities for All proposal which would direct cap and trade auction revenues to building and preserving affordable homes near transit, public and active transit options, and energy efficiency and sustainable energy resources for multifamily homes affordable to low-income households. The aim of this proposal is to achieve the goals of AB 32 and SB 375 equitably by providing transportation and housing choices that allow all Californians to drive less and reduce household costs, especially for low-income households. **On behalf of my company, Affirmed Housing, I urge you to include these strategies in the investment plan for cap and trade auction revenues.**

Active for over 20 years, Affirmed Housing has created over 3,000 homes for families throughout California. We utilize green building features and can proudly say that ALL of our 22 communities are within walking distance of amenities, most important, public transportation.

California's transportation sector is responsible for the most emissions of any sector, 38%, making it an important focus. **Because transportation needs are driven in large part by where people want - and can afford - to live, housing affordability directly affects the sector's emissions.** Investment in the sustainable development and preservation of affordable housing will significantly reduce vehicle miles traveled and help the state meet its greenhouse gas reduction goals while also benefiting disadvantaged communities pursuant to the requirements of SB 535.

- Low-income households are the most likely to shed their cars and ride transit when given the opportunity to live near a robust transit line. They are also the most likely to be displaced when rising property values near new transit lines drive up rents. This displacement robs the transit system of ridership and reduces its GHG benefits.
- By taking existing public transportation instead of driving a car, a single person prevents 4,800 pounds of CO2 from entering the atmosphere each year.
- Lower income households use 28% more energy per square foot than higher-income households primarily because they live in older, less energy-efficient

homes. Energy efficiency and sustainable energy investments in low-income multifamily properties provide an excellent opportunity to reduce greenhouse gas emissions, improve public health, and lower operating costs to residents and building owners, helping to preserve affordable rents and provide financial relief.

There are several existing state programs which could be used to promote investment in these areas:

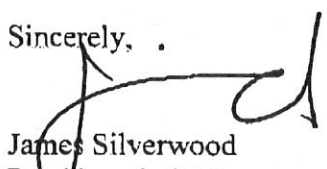
1. The California Department of Housing and Community Development's (HCD) Multifamily Housing Program (MHP) and affordable Transit-Oriented Development (TOD) program
2. The Energy Savings Assistance Program, Weatherization Assistance Program, and the Multifamily Affordable Solar Homes Program
3. The State Transit Assistance Program and proposed Active Transportation Program

Affirmed Housing utilizes HCD funds on many of our communities and in recent years, TOD funds have enabled hundreds of families to have clean and safe affordable housing. The Energy Savings Assistance Program has allowed us to build so green so that we can offer our tenants lowered utility rates.

Cap and trade auction revenues are a critical resource, since substantial state and federal reductions in funding for transportation and affordable housing threaten the ability of communities to achieve AB 32 and SB 375 goals. Therefore, we urge you to direct a significant percentage of the revenues to improve clean transportation choices, build and preserve homes affordable to low-income households near transit, and invest in energy efficiency and sustainable energy improvements to multifamily homes affordable to low-income households.

We thank you for the opportunity to provide this input.

Sincerely, .



James Silverwood
President & CEO
Affirmed Housing Group