November 11, 2015

Chair Mary Nichols and Board Members

California Air Resources Board

1001 I Street

Sacramento, CA 95814

RE: Draft Cap-and-Trade Auction Proceeds Second Investment Plan

Dear Chair Nichols and Board Members:

On behalf of Strategic Concepts in Organizing and Policy Education (SCOPE), I would like to thank the Air Resources Board (ARB) for providing the opportunity to give feedback on *the Draft Cap-and-Trade Auction Proceeds Second Investment Plan: Fiscal Years 2016-17 through 2018-19*. We greatly appreciate the ARB’s ongoing efforts to incorporate the public’s recommendations into the Plan’s priorities.

SCOPE is a 22**-**year-old community organization based in South Los Angeles that has worked over the past 10 years to create replicable models for targeted training and career-path job opportunities for disadvantaged workers in the climate and green jobs sector. We are currently working with other South Los Angeles**-**based organizations through the Los Angeles Equity Alliance to ensure equitable investment and full integration of low-income communities in climate resilience efforts and high-road green job creation.

As the agency tasked with identifying priorities to help achieve greenhouse gas (GHG) emission reduction goals, maximize benefits to disadvantaged communities, and yield valuable co-benefits, we believe that the ARB’s recommendations would be strengthened by providing more emphasis on job growth and workforce development benefits—a key post**-**2020 implementation strategy identified by State agencies. Our comments focus on specific areas in which the ARB can incorporate the issue of job creation and workforce development—in relation to disadvantaged workers in particular—in the overarching strategies to transition to a low-carbon economy.

**Recommendations:**

1. **Include job creation & workforce development in the assessment of gaps and needs**

Including a better gap and needs assessment related to job creation and workforce development can help ensure that future programs maximize economic benefits, foster job creation, and direct investment toward the most disadvantaged communities in the state. Reaching the State’s long**-**term goals will require significant policy, development and industry shifts, and understanding the workforce and training needs of the new clean energy economy is imperative. Such an assessment should also explicitly look at potential job creation and economic co**-**benefits to disadvantaged workers.

1. **Intentional investment in job creation and training programs**

Under each investment concept, the ARB should discuss potential job creation and training opportunities. Given the strong policy mandate to maximize job creation, particularly among the state’s disadvantaged workers, the ARB should provide additional context on job creation for decision-makers. Where possible, the Plan should highlight industries where successful and scalable training models and career-pipelines exist.

1. **Research, development and deployment of innovative workforce and targeted training strategies related to Cap-and-Trade funded programs and projects**

The Plan should prioritize investment in innovative program models that develop successful job placement and training opportunities using concrete workforce indicators and metrics in conjunction with GHG emission reduction benefits. Research and development support are needed to ensure targeted**-**hiring, training, and new career**-**track job development models go hand-in-hand with GHG reductions. Training investments will not only lead to a higher skilled workforce, but have been proven to produce more effective greenhouse gas reduction outcomes. Additionally, thoughtful investment in successful job and targeting models will help low-skilled, incumbent, and disadvantaged workers access jobs in the growing clean energy economy, ensuring it is inclusive and accessible to all California’s workers.

1. **Integrating complementary jobs and workforce recommendations in future program guideline development**

These recommendations require better coordination between the ARB, which develops investment priorities and funding guidelines, and the agencies administering program funds, so that investments in training and project performance goals can be tracked and evaluated and concrete job and training goals can be set. Integrating these recommendations into the Second Investment Plan will ensure that additional workforce-related recommendations at the program guideline-level are more effective.

We appreciate the opportunity to share our comments and we thank you for all the work your agency has done to implement these important programs. I am available to discuss our workforce models and our recommendations more in depth. Please feel free to reach out with any questions or if you would like more information. We look forward to working with you to ensure that our state’s most disadvantaged workers and their families are able to benefit from these investments.

Sincerely,

Laura Muraida

Research Director

Strategic Concepts in Organizing & Policy Education (SCOPE)