    

July 23, 2019

Shirin Barfjani

Air Pollution Specialist

California Air Resources Board

1001 I Street

Sacramento, CA 95814

**RE: Comments on Innovative Clean Transit Rule and Job Creation**

Dear Ms Barfjani,

On behalf of the organizations listed below we would like to submit the following comments on the Innovative Clean Transit Rule and its job creation potential. Our request is particularly urgent as this is one of the last comment periods before the Innovative Clean Transit Rule goes before the board in September. The California Air Resource Board has an unmissable opportunity to spur good job creation in the state and ensure that this impending rule does not only benefit the bottom lines of electric bus manufacturers but also benefits disadvantaged communities. While the ICT will increase demand for electric buses and help drive business to many of the ZEB manufacturers in California, without intentional policies these economic benefits will not be seen by community members and workers who are often left behind by economic investments.

It is imperative that ARB encourage transit agencies across California to adopt good jobs policies such as the US Employment Plan as they transition to 100% electric buses. Good jobs policies should include provisions for access to good jobs for disadvantaged communities, incentives for creating jobs, investments in workforce development and incentives for minority owned businesses to create good high road jobs and have access to contracting opportunities.

**Specifically we request that ARB signal to transit agencies that it is crucial they adopt intentional jobs policies when transitioning their bus fleets to ZEBs to ensure that there are investments in workforce development and pathways to good jobs for disadvantaged communities.**

As we have shared in previous letters and meetings with ARB staff, the Innovative Clean Transit Rule could create and sustain thousands of jobs up and down the supply chain of electric bus manufacturing in the United States. Many of these jobs could be created or sustained in California, where there is an emerging electric bus manufacturing hub. With intentional job creation and equity-focused policies such as the US Employment Plan, California transit agencies could incentivize EV bus manufacturers to partner with community to create U.S and CA clean family-sustaining manufacturing jobs, workforce development and pathways for disadvantaged communities into these clean economy careers.

As the SB350 Barrier Study expanded the purview of the California Air Resources Board to also consider impacts on disadvantaged communities and access to workforce development for these communities as part of their rule making process, we ask that ARB recommend that transit agencies in California consider incorporating job creation and equity-focused policies such as the USEP when procuring electric transit buses and other types of transit vehicles and highlight the importance of intentional jobs policies. Given that transit agencies are using public dollars to purchase these vehicles, ARB should work with these agencies to ensure that there are maximum taxpayer benefits from this rule in the form of not only clean air, but also access to good job for communities bearing the brunt of greenhouse gas emissions and communities that have historically been excluded from good manufacturing jobs.

Sincerely,

David Campbell

Secretary-Treasurer

United Steelworkers Local 675

Hasan Solomon

Legislative Director

International Association of Machinists and Aerospace Workers

Abhilasha Bhola

Senior Policy Coordinator

Jobs to Move America

JB Tengco

West Coast Director

Blue Green Alliance

Allison Mannos

RePower LA Director

LAANE

Aubry Stone

Executive Director

California Black Chamber of Commerce

Laura Muraida

Research Director

SCOPE

Stephanie Tsai

CEJA