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## EXECUTIVE DIRECTOR

**Roxana Tynan**

August 5, 2015

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

## **Re: Comments on the Draft Funding Guidelines for Agencies that Administer California Climate Investments**

Dear Chairman Nichols and Executive Officer Corey:

Thank you for the opportunity to submit comments on the Draft Funding Guidelines. The Los Angeles Alliance for a New Economy is a non-profit organization that works in coalition to advocate for policies and projects that promote thriving communities, environmental benefits and good jobs. We have worked for more than two decades to raise living standards for low income communities and create career opportunities for job seekers from disadvantaged communities. We have successfully advocated for policies and programs to reduce Greenhouse Gas emissions and toxic pollution, including 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.

There has been a lot of discussion of the employment benefits of clean energy because the work is more labor intensive than that of the fossil fuel industry. But less attention is paid to the relative quality of clean energy jobs. The significant investment that the state is making in programs for disadvantaged communities represents an important opportunity to look more closely at this issue, and to incentivize programs that are providing career opportunities for low income communities and job seekers that face barriers to employment. In order for the transition toward clean energy to truly benefit the targeted communities, the new clean energy jobs need to compensate workers fairly and provide ladders of opportunities to job seekers. For this reason, we support the following amendments to the Guidelines:

- ARB should direct administering agencies to prioritize projects that meet baseline targets to increase access to good jobs and training for disadvantaged workers and those living in disadvantaged communities. The guidelines currently include only optional criteria for projects to fulfill SB 535 requirements through targeted hire or training of residents from disadvantaged communities.
- ARB's Guidelines should require adequate reporting and data collection in order for the public to evaluate the quality of jobs created through SB 535 investment.
- ARB should improve its metrics. LAANE supports UC Berkeley Don Vial Center on Employment and the Green Economy's recommendations for improving metrics.
- ARB should mandate that projects produce multiple co-benefits. While the supplemental language provides important guidance for agencies to prioritize or award extra points to project that provide multiple co-benefits, it stops short of requiring those benefits.

In California, we have an exciting example of clean energy investment that is providing quality jobs and job access for disadvantaged workers, including the DWP's Home Energy Improvement Program, LA Unified School District program, and the Small Business Direct Install program. Together, these programs have served more than 20,000 DWP customers since 2011 while also creating good jobs in both the public and private sector.

We are pleased that the DWP is currently working on the development of a 40 MW Community Solar program that would allow low income subscribers (including renters) to lock in their utility rates.<sup>1</sup> 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, is in support of such a program, and is working to ensure that it truly serves low income communities and renters while providing good jobs for LA communities most in need.

A cornerstone of DWP's clean energy program is the Utility Pre-Craft Trainee program, a partnership between IBEW Local 18 and DWP that has put 170 disadvantaged L.A. residents (and counting) to work on energy efficiency projects. Those jobs pay \$16 per hour jobs with benefits and lead to real careers in the utility industry. The trainee workforce reflects L.A.'s ethnic diversity, has a relatively large percentage of women, and some 55 percent report have some barrier to employment, such as a criminal conviction history, long-term unemployment or being a single parent. The point of entry for these trainees has been the DWP's Home Energy Improvement program, a free home energy upgrade program that is targeted to low income communities and that received start-up funding from a federal stimulus grant that was administered by the Community Services Department.

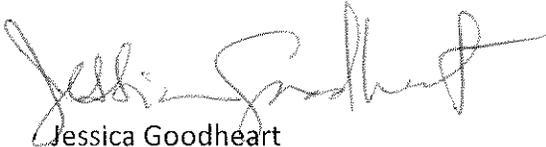
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<sup>1</sup> Recently, LAANE released maps, co-created with SCOPE, highlighting the disparities in residential solar rebates through the City. Neighborhoods like Boyle Heights and Watts each received less than 1% of residential solar rebates. Communities with higher rates of poverty had limited access to solar incentives, that could dramatically reduce their electricity bills while generating clean energy, while wealthy communities received up to 250 times greater investment.

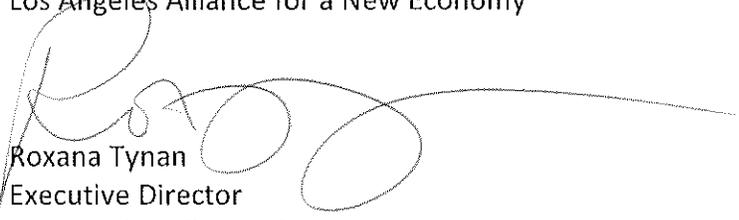
The State has a great opportunity to better understand the impact of that the transition away from fossil fuels will have on California's workforce, to promote the creation of good jobs that are accessible to those who need them most, and to ensure programs serve disadvantaged communities in multiple ways.

Thank you for your considering these comments.

Yours,



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



Roxana Tynan  
Executive Director  
Los Angeles Alliance for a New Economy