

August 11, 2015

Dear Chair Mary D. Nichols,

On behalf of Strategic Concepts in Organizing and Policy Education (SCOPE), I would like to thank the California Air Resources Board for providing comprehensive guidance to the agencies administering proceeds from the Greenhouse Gas Reduction Fund (GGRF).

SCOPE is a 22-year-old community organization based in South Los Angeles. For over a decade, SCOPE has worked in partnership with community organizations, environmental groups and labor to create replicable models for targeted training and career-path job opportunities 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 itengration of low-income communities of color in climate resilience efforts and high-road green job creation in our communities.

As the agency tasked with developing guidance that ensures the accuracy, accountability and effectiveness of GGRF funded programs, we believe that the Air Resources Board's recommendations would be strengthened by providing more prescriptive guidance related to job growth and workforce development. Adding additional workforce-related recommendations and requirements can help ensure that programs maximize economic benefits, foster job creation, and direct investment toward the most disadvantaged communities in the state. In order to meet these goals, SCOPE recommends the following:

1. **Ensure Investments Create Good Quality Jobs:** Direct administering agencies to work with the State Labor and Workforce Development Agency to establish wage floors and identify other best practices, including local/targeted hire labor agreements, for all programs and projects receiving funds from the GGRF. While some industry wage mandates already exist, the administering agencies, with guidance from the state Labor Agency, should determine and require wage floors.

Maximizing economic co-benefits requires a strong entry-level wage floor as well as ladders up the wage scale as skills are acquired. Wage mandates have been shown to improve productivity and job quality, whereas volunteer work and relying on minimum wages does not provide family-sustaining income. The lack of good quality job standards and best practices significantly limits the ability of disadvantaged communities to benefit from potential job opportunities in the climate industry.

 Develop Partnerships to Facilitate Outreach & Training: Dedicate guidance, capacity and/or funds to facilitate collaborations between agencies and local community-based organizations (CBOs), local Workforce Investment Boards, community colleges, and other training entities to strengthen outreach and training in disadvantaged communities. Many local CBOs and training

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entities already have deep relationships with residents and small businesses in disadvantaged communities, and provide proven job readiness and training certifications. With stronger collaboration among agencies and CBOs and training institutions there is potential to: (1) leverage resources; (2) avoid duplication of services; (3) reach more disadvantaged workers and residents; (4) establish training and job placement standards across providers; and (5) open up opportunities for CBOS and small businesses owned by people of color, women and other diverse communities to apply for additional grants and funding. The Department of Community Services and Development's Low-Income Weatherization Program is a prime example of a program that can benefit from collaborative outreach and job training efforts.

- 3. *Measure Goals through Job Tracking & Reporting:* Implement the use of a cost-effective job tracking and labor compliance system that collects performance, worker demographics, and job quality data across all agencies that receive GGRF allocations. In order to ensure agencies meet statutory economic development goals, the ARB should track and evaluate the quantity and quality of all jobs created along with the geographic and demographic distribution of jobs. These indicators should be used to inform best practices and to prioritize future investments. This data will also help policymakers ensure disadvantaged communities have adequate access to job opportunities created through the GGRF.
- 4. **Maximize Benefits for Disadvantaged Communities:** Use the GGRF allocations to fund proven training models targeted for disadvantaged communities, such as the "earn while you learn" model. Programs that provide on-the-job training, training embedded in a broader occupational training program, lead to industry-recognized credentials or certifications, and have a high job-placement rate should be explicitly prioritized for funding. Training investments will not only lead to a higher skilled workforce and more effective greenhouse gas reduction, but also will help low-skilled, incumbent, and disadvantaged workers access jobs in the climate industry.

Through our work to create workforce opportunities in the green economy, SCOPE, along with the Los Angeles Alliance for a New Economy and its allies in the RePower LA coalition, have supported the creation of the Utility Pre-Craft Trainee Program by the LA Department of Water and Power and IBEW Local 18. Since 2011, the Utility Pre-Craft Trainee project has put 170 disadvantaged residents to work on energy efficiency projects. These training positions start at \$16/hour with benefits and lead to career-path civil service jobs.

SCOPE would be more than happy to continue to discuss our workforce models and additional ways that the Air Resources Board can maximize the economic co-benefits of each program area, specifically in relation to disadvantaged workers. Please feel free to reach out to SCOPE with any questions or if you would like more information.

Thank you for providing us the opportunity to share our comments and thank you for all the work you've done to implement these important programs.

Sincerely,

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Manisha Vaze Director of Organizing SCOPE – South Los Angeles