



Shirin Barfjani
 Air Pollution Specialist
 California Air Resources Board
 1001 I Street
 Sacramento, CA 95814

RE: Comments on Innovative Clean Transit Rule Initial Statement of Reason and Job Creation in Response to 15 Day Notice

Dear Ms. Barfjani,

Thank you for your consideration of our October 1st comments on the need for proactive policies in the low carbon transportation sector to ensure high quality job creation and job access for disadvantaged communities. We commend California Air Resources Board members for their supportive statements at the October Board meeting recommending use of such procurement policies, like the US Employment Plan. We hope that you incorporate these concepts in the Innovative Clean Transit Rule’s Final Statement of Reasons as we, the undersigned, have suggested. We look forward to continuing to work with ARB to spur good job creation throughout the state.

On behalf of the organizations listed below, we urge the California Air Resources Board (“CARB”) to highlight the value of high quality job creation associated with the Innovative Clean Transit Rule (“ICT”). While we strongly support the Rule’s movement toward 100 percent zero emission buses, the Rule should also acknowledge the need for a ‘holistic approach’ to meet all of the community needs, including access to quality jobs in addition to air quality standards and combatting climate change.

CARB can and should encourage transit agencies to use policy tools that have a proven track record of delivering on high quality job creation, access to these jobs for disadvantaged communities and apprenticeship and pre apprenticeship programs. We recommend that CARB encourage transit agencies to use workforce policies, such as the US Employment Plan, as part of California's transition to zero emission buses through CARB's Statement of Reasons. We propose sample language in the statement of reason as seen in the attached document.

Currently, the Initial Statement of Reason discusses how the ICT can help address the disproportionate barriers that low-income and disadvantaged communities face. We applaud CARB's efforts to both achieve equitable access to clean transportation and overcome barriers that are "magnified for those with limited financial resources." We also appreciate that CARB highlights the potential job creation benefits of the ICT and even cites Jobs to Move America's Community Benefit Agreement with BYD as a potential outcome.

However, we believe that the Initial Statement of Reasons does not recognize the link between intentional workforce policies and the job quality / job access outcomes identified in the BYD example. We are concerned that without intentional policies, the co-benefits of "high quality job opportunities" and "employment in disadvantaged communities" described by the Statement of Reason are less likely to materialize.

LA Metro is the best example of an agency that leverages its zero emission bus efforts in ways that create economic benefits for low-income Californians. Of the seven listed electric bus manufacturers, only BYD has signed a Community Benefits Agreement (CBA). The CBA was spurred by LA Metro's commitment to proactive policies that create good jobs for communities facing significant barriers to employment.

LA Metro also has a Construction Careers Policy that ensures that all construction projects are done via skilled trades that utilize apprenticeship programs and pay family-sustaining wages. These workforce policies continue to lift barriers to employment to underserved workers and meet the intended goals of the SB350 Barrier Study. CARB has upcoming opportunities to require the use of such workforce policies for the zero emission transit fleets' infrastructural build out. This will ensure zero emission infrastructure is performed by a skilled workforce and result in optimum performance and protect public safety. As well, these kind of intentional workforce policies provide access to communities that have been previously underrepresented in the skilled trades.

We recognize CARB's leadership in helping develop recommendations and policies that can deliver co-benefits for all communities. CARB's "Low-Income Barriers Study, Part B: Overcoming Barriers to Clean Transportation Access for Low-Income Residents,"¹ UC Berkeley's "Methods to Assess Co-Benefits of California Climate Investments"² developed for CARB, and CARB's "Clean Vehicle Rebates, Reporting Document"³ have all pointed to ways that ARB can assert proactive leadership to assist disadvantaged communities.

CARB can continue its leadership by laying the groundwork to maximize economic opportunities for low income residents. CARB should recommend transit agencies (and CARB itself) link incentives to those projects that demonstrate "economic benefits for low income residents" and by connecting these residents to good quality clean transportation jobs and the associated training and workforce development opportunities.

CARB and transit agencies across the state have the power to signal the importance of job access and job quality to electric bus manufacturers by encouraging the adoption of policies such as the US Employment Plan and the Construction Careers Policy. We believe that the Statement of Reason is the next logical step demonstrating the importance of investing in a clean economy that works for every Californian.

Sincerely,

John E Harriel Jr.
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Big John Cares

JB Tengco
West Coast Director
Blue Green Alliance

Stephanie Tsai
Climate Justice Program Associate

¹ California Air Resources Board. "Low-Income Barriers Study, Part B: Overcoming Barriers to Clean Transportation Access for Low-Income Residents." https://ww2.arb.ca.gov/sites/default/files/2018-08/sb350_final_guidance_document_022118.pdf. (Feb. 2018), p. 16.

² Roland-Holst, et al; Center for Resource Efficient Communities, UC-Berkeley. "Methods to Assess Co-Benefits of California Climate Investments." https://www.arb.ca.gov/cc/capandtrade/auctionproceeds/ucb_lit_rev_on_jobs.pdf?_ga=2.236175171.399163388.1536262243-1971758094.1469233960. (Nov. 2017), p. 2.

³ California Air Resources Board. "Clean Vehicle Rebates, Reporting Document." <https://ww2.arb.ca.gov/resources/documents/cqi-quantification-benefits-and-reporting-materials>. Data Dictionary p. 8.

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**Proposed Additions to the ICT Initial Statement of Reasons
(Additions are in Bold)**

We commend ARB for highlighting job creation, especially as exemplified at BYD as a potential co-benefit of the Rule especially for communities facing significant barriers to employment. To strengthen language around job creation co-benefits, ARB should specify the characteristics of good jobs, as defined by previous ARB studies. Furthermore, ARB should also include examples of policies such as the US Employment Plan that have led to the types of co-benefits ARB has identified in the SB350 Barrier Report.

Section ES-8

“Third, ZEB manufacturers can bring high quality jobs, **as defined in previous ARB studies and reporting standards on co-benefits**, to California, including in disadvantaged and low-income communities, which is a unique opportunity for these communities for workforce expansion and training.”

Section V-4

“E. Benefits in Disadvantaged Community and Job Creation

The proposed ICT regulation is anticipated to deliver environmental benefits that include GHG and criteria pollutant emission reductions in the DAC areas where there are more transit dependent riders. In addition to reducing emissions, the ZEB industry is bringing high quality employment opportunities to California. There are several ZEB manufacturers with plants located in California, such as BYD Motors Inc., Complete Coach Works, Ebus, El Dorado National California, GILLIG, GreenPower, and Proterra. As the production of ZEBs increases, so would the number of manufacturing and related jobs for DAC areas. Electricians, construction companies (such as infrastructure installers), some bus manufacturers, fuel V-5 cell and battery producers, and electric drivetrain parts and components suppliers can fall into the small business category. **To ensure that California maximizes the job creation opportunity, CARB and transit agencies should leverage high quality jobs through the promotion of proactive policies such as the US Employment Plan and Construction Careers that provide family sustaining wages, benefits, apprenticeship and pre apprenticeship training, targeted hire in disadvantaged communities, safe working conditions, job retention, and leave policies.**”

Section VII-3

“In addition to reducing emissions, the proposed ICT regulation is expected to attract ZEB industries to bring high quality job opportunities to California and to support employment in disadvantaged communities. As the demand and production of ZEBs increases, so would the number of ZEB manufacturing, operation and maintenance related jobs in California. For example, BYD, located in Lancaster, California, has a community benefits agreement (CBA) with Jobs to Move America (JMA), which will support the creation of a robust U.S. jobs program through deep investments in pre-apprenticeship and training programs. This CBA has a goal of recruiting and hiring 40 percent of its workers from populations facing significant barriers to employment, such as veterans and returning citizens. 97 In addition, populations that have historically been excluded from the manufacturing industry, such as women and African Americans are also expected to be recruited and placed. The agreement also includes commitments from BYD to work with the JMA coalition to provide support systems for these workers to strengthen retention efforts, such as providing transportation for workers who may not have access to a car.

Considering previous missed opportunities in workforce policy, CARB should incentivize high quality job creation within evolving zero-emission transportation industries. ARB has defined high quality jobs as those with family sustaining wages, benefits, apprenticeship and pre apprenticeship training, targeted hire in disadvantaged communities, safe working conditions, job retention, and adequate leave.