INTRODUCTION

On behalf of the undersigned environmental justice and equity organizations, we write regarding the need to maintain critical Greenhouse Gas Reduction Fund (GGRF) investments to priority populations. Together, our groups are dedicated to delivering real benefits to Californians who live closest to and are most socioeconomically vulnerable to pollution as we reduce greenhouse gas emissions. Our organizations are committed to meaningfully advancing equity and making the transformative investments necessary to comprehensively address climate change impacts and related economic needs in priority communities.

In the wake of COVID-19, we urge continued investment in the programs that we know reduce poverty and pollution at the same time. These programs have been funded out of the GGRF for the last several years, and provide direct benefits to priority communities as defined by SB 535 (De León, 2012) and AB 1550 (Gomez, 2016).

Priority communities, such as disadvantaged, low-income or vulnerable populations, and communities of color face the greatest threats from climate disasters and have the fewest material resources to adapt to a changing climate. To make equity real in our climate fight, we must elevate the needs of priority communities, ensure that we achieve meaningful benefits to these populations, and invest more significantly in community-led transformations. Moreover, equity strategies require that climate change investments build assets and wealth that lead to greater economic security and mobility, proactively enhancing the capacity of impacted populations and communities to participate in the clean energy economy.

GUIDING PRINCIPLES FOR EQUITABLE INVESTMENT IN PRIORITY COMMUNITIES

We offer the following investment principles to ensure that priority communities truly benefit from, and shape, the investments required in this moment.

1. Investments must be targeted to priority communities. Delivering real benefits to Californians who live closest to and are most socioeconomically vulnerable to pollution is a core component of the State’s greenhouse gas emissions reduction efforts under AB 32 (Nuñez, 2016) and SB 32 (Pavley, 2016). The Greenhouse Gas Reduction Fund must reaffirm the State’s commitment to SB 535 (De León, 2012) and AB 1550 (Gomez, 2016) to invest in priority communities and should seek to continue exceeding the 35% minimum targets for investments in priority communities.

2. Investments must be community-driven. For investments to have community benefit, they must also be community-driven. Programs and projects must facilitate and require community leadership, decision-making power and robust community engagement.
3. **Investments must significantly address the needs of priority communities and maximize benefits.**
Investments must correspond to the needs of priority communities, and must also achieve multiple direct and meaningful economic, health and environmental benefits to priority communities.

4. **Investments must avoid burdens.** Investments must avoid burdens (e.g., physical and economic displacement of low-income households, increased exposure to toxins, decreased air and water quality) to the very residents and communities that these investments intend to benefit. In a COVID-19 world, we cannot afford to make investments that are harmful to priority communities.

5. **Investments must be multi-sectoral to achieve transformation.** Priority communities require more than just one type of investment. To achieve transformation, we must invest comprehensively to deliver better public health outcomes, environmental benefits and economic opportunities for priority communities.

**RECOMMENDATIONS FOR ANNUAL GGRF APPROPRIATIONS**

We support the following programs which we believe should be your highest priorities to deliver benefits to priority populations. We strongly encourage funding these programs at the specified amounts below since they were not included in last year’s plan and must be prioritized in the 2021 Greenhouse Gas Reduction Fund to support their critical operation.

- **Low Carbon Transportation Equity Programs -- $100 M**
  Electric vehicle equity programs have proven health and economic benefits for families and communities. These programs create innovative clean mobility strategies including electric car share and micromobility options that provide alternate modes of connection between people and their jobs.
  
  *For more info: Alvaro Sanchez ([alvaros@greenlining.org](mailto:alvaros@greenlining.org)); Leslie Aguayo ([lesliea@greenlining.org](mailto:lesliea@greenlining.org))*

- **Clean Trucks and Buses -- $200 M**
  There are currently 1.9 million heavy duty trucks operating on California's roads, facilitating goods movement that contributes to air pollution and toxic health outcomes which disproportionately impact low-income communities of color. To mitigate these impacts California must continue to invest in the electrification of trucks and buses.
  
  *For more info: Alvaro Sanchez ([alvaros@greenlining.org](mailto:alvaros@greenlining.org)); Leslie Aguayo ([lesliea@greenlining.org](mailto:lesliea@greenlining.org))*

- **Urban and Community Forestry -- $30 M**
  Local access to nature is critical to the mental and physical health of disproportionately underserved communities -- now more than ever, California's urban forests are critical to helping the most vulnerable populations adapt to climate change and create community resiliency. In urban areas, where 90% of Californians live, the primary mechanism to sequester carbon, clean our air, and reduce stormwater runoff is our urban forests. CAL FIRE’s Urban & Community Forestry Program advances all of these objectives while also supporting jobs and workforce development in California’s most underserved communities and contributing to the goals and objectives of Governor Newsom’s Executive Order on Natural and Working Lands.
  
  *For more info: Chuck Mills ([cmills@californiareleaf.org](mailto:cmills@californiareleaf.org))*

- **Transformative Climate Communities -- $100M**
  The Transformative Climate Communities program advances community-led decision-making to address the needs of residents and achieve local transformation. Multiple emission-reducing services delivered in a coordinated way – like affordable solar-powered housing with access to public transit and...
active transportation -- can transform long-neglected neighborhoods into models of economic and environmental sustainability.

For more info: Emi Wang (emiw@greenlining.org)

● **Low-Income Weatherization Program -- $75 M**

Clean energy services, including energy efficiency and solar, for low-income households and building owners leading to affordable housing preservation, utility bill reduction, job creation, improvement of resident health, safety, resilience and comfort. Streamlining delivery of energy upgrades through LIWP and home health remediation efforts is also being undertaken with the implementation of AB 1232 (Gloria, 2019), which will ensure that priority populations can access and maximize these integrated benefits quickly.

For more info: Amee Raval (amee@apen4ej.org)

● **Regional Climate Collaboratives -- $5 M**

Implementation of SB 1072 (Leyva, 2018) to create the Regional Climate Collaboratives program will build the capacity of local communities to make the investments necessary to transition all of California to a climate resilient future. The collaboratives will assist in building community-driven leadership, knowledge, skills, technical assistance and resources to identify and access public funding for climate mitigation and adaptation projects.

For more info: Emi Wang (emiw@greenlining.org)

● **Community Emissions Reduction Program (AB 617)**

The Community Emissions Reduction Program under AB 617 remains an important program to address air quality improvements in environmental justice communities in California, especially given the federal rollback on air pollution regulations. However, there are fundamental improvements that must be made to better deliver on community needs, including:

- Mandatory regulatory strategies to ensure quantifiable emissions reduction.
- Emission reductions (both regulatory and incentive based) that are accountable and conform to community priorities.
- Funding for technical assistance and capacity-building to strengthen and support robust community involvement.
- Inclusion of mobile sources, area wide sources, and pesticides in CERPs.
- Prohibition on more allowable emission sources within the CERP geographies.
- Expansion of emission reduction strategies, through additional CERPs across the entire state.
- Sector-based approach to carbon emission reduction that can be implemented regionally.
- Clarification on CARB’s authority to modify an inadequate plan and direct plan development and implementation, when necessary.
- Measures to prevent conflicts of interest for members of Steering Committees.

For more info: Gina Charusombat (gcharusombat@scopela.org)

PROTECT THESE CONTINUOUS GGRF APPROPRIATIONS

We support the following programs receiving continuous appropriations from the Greenhouse Gas Reduction Fund to deliver benefits to priority populations.

● **Affordable Housing & Sustainable Communities**

The AHSC program is a crucial and intersectional program that reduces greenhouse gas (GHG) emissions through projects that implement coordinated affordable housing, land-use, and transportation projects in disadvantaged communities, while also reducing air pollution and improving connectivity and accessibility to jobs, healthcare services, and other key destinations.

For more info: Chuck Mills (cmills@californiareleaf.org)
• **Low-Carbon Transit Operations Program (LCTOP)**
  Since its creation in 2014, the LCTOP has provided hundreds of millions of dollars to much-needed transit operations throughout the state. Distributed by formula, the program's strict requirements to benefiting disadvantaged communities (50% of its funds in any transit agency with a DAC in its service area) push agencies to improve service to historically overlooked communities -- the same communities that both benefit far greater from transit, and house higher-propensity transit riders.

*For more info: Chuck Mills ([cmills@californiareleaf.org](mailto:cmills@californiareleaf.org)); Alvaro Sanchez ([alvaros@greenlining.org](mailto:alvaros@greenlining.org))*

**PROTECT 5 YEAR INVESTMENTS FOR LOW CARBON ECONOMY WORKFORCE PROGRAM**

*We support maintaining the 5-year investment in this program for the Workforce Development Board.*

• **Workforce Development for a Low Carbon Economy**
  Through industry-based, worker-focused training partnerships, the California Workforce Development Board is expanding career pathways in the low-carbon economy for workers that have long been excluded from stable, healthy, family-supporting jobs. These strategies include pre-apprenticeships, apprenticeships, and incumbent worker training with robust wrap-around services. The funding will also pilot worker retraining and transition assistance for sectors and regions facing climate change impacts, further increasing economic security and climate resilience for vulnerable communities.

*For more info: Tiffany Wong ([twong@scopela.org](mailto:twong@scopela.org))*

**CONCLUSION**

We look forward to working with Governor Newsom's administration to prioritize communities hit hardest by pollution and climate change. The programs outlined above will help protect California from climate impacts, reduce pollution in the most polluted communities and build community resilience. While this letter focuses on the GGRF, our groups want to make it clear that should the Governor propose a comprehensive climate budget as was the case last year, we expect to see a more explicit and developed equity strategy across all proposed strategies as discussed in our [letter submitted on 3/23/20](mailto:letter submitted on 3/23/20).

Sincerely,

Sona Mohnot  
The Greenlining Institute

Mariela Ruacho  
California ReLeaf

Tiffany Wong  
Strategic Concepts in Organizing and Policy Education (SCOPE)

Alma Marquez  
Center for Community Action and Environmental Justice

Miya Yoshitani  
Asian Pacific Environmental Network (APEN)