

September 15, 2026

California Air Resources Board
1001 I Street Sacramento, CA 95814
P.O. Box 2815, Sacramento, CA 95812
Submitted Via email to *ggrfprogram@arb.ca.gov*

Re: California Climate Investments - Supplemental Guidance to Avoid Substantial Burdens or Harms to Priority Populations

The Center for Progressive Reform is a non-profit research and advocacy organization that is guided by a national network of scholars and professional staff with expertise in governance and regulation. Our climate justice program is focused on addressing social challenges and the concerns of historically marginalized communities by centering racial and economic justice in climate policy. We appreciate the opportunity to provide comments to the California Air Resource Board (CARB) on the Draft Supplemental Guidance to Avoid Substantial Burdens or Harms to Priority Populations.

Our comments are also informed by our research and engagement with stakeholders across the state and by our 7-part report series on California's funding programs and funding mechanisms published in 2024. In this series, my co-author Professor of Law Alice Kaswan and I provide comprehensive analysis and recommendations for more effectively directing funding for climate programs to historically marginalized communities most in need to help meet our state's climate goals while also advancing equity and environmental justice, and ensuring a just transition to a net zero and clean energy future.

Based on this analysis which is informed by leading experts, community leaders, advocates, and practitioners, we recommend that the following general principles be incorporated as part of guidance for agencies administering Climate Investments, projects and programs:

- Center income and racial equity, and prioritize benefits for priority populations, and communities and households most in need.
- Develop an integrated vision and plan that knits together fragmented programs and funding streams.
- Prioritize and expand interdisciplinary, multi-sector projects, programs and strategies that recognize holistic and interconnected needs and provide multiple benefits that uplift

historically overburdened and underserved communities.

- Prioritize community-scale funding over individual piecemeal projects and programs to enable community-driven planning that fosters widespread participation and self-determination. Use community planning as the basis to inform agency and investment planning.

Comprehensive Investment Planning

We applaud the CARB and California agencies for the progress that the state has made in deploying nearly $16 billion in Climate Investments since 2016. However, our report series on California's climate funding programs also identified a lack of comprehensive climate planning and need for coordination across state agencies and with local jurisdictions. The current scale and speed of delivery of investments is not currently keeping pace with climate impacts that communities across California are experiencing. Billions more dollars, if not trillions, are needed to complete CA's transition to a zero carbon clean energy economy and secure the health and safety of our state's residents from climate impacts that are already here.

Not accounting for the cost of recent climate disasters, state programs are consistently oversubscribed with demand exceeding available allocated funds many times over. Additional costs for emergency response, recovery and rebuilding efforts related to recent climate-related disasters, including wildfires, extreme heat, and coastal flooding and erosion will continue to strain local and state budgets. Moreover, recent amendments to the Cap and Invest and Greenhouse Gas Reduction Fund approved by CARB earlier this year severely reduced funding allocations to Tier 3 programs for affordable housing and transit infrastructure. These billions in cuts to local infrastructure programs will make it even more difficult if not nearly impossible for local governments to implement their climate action plans and for the state to meet its statewide climate goals. This will directly exacerbate and amplify burdens and harms to priority populations and especially those who are most vulnerable and rely on public infrastructure to access basic resources, educational and job opportunities.

This is why it is imperative for CARB and state agencies to prioritize development of a comprehensive integrated investment planning framework. The best way for CARB and other state agencies to prevent and avoid adverse burdens or harms to communities is to significantly overhaul, rethink and restructure the administration of programs to prioritize community-centered planning and capacity building for local climate action. A place-based and community-centered approach to investment planning is needed to eliminate redundancies in agency authority and increase holistic and mulit-faceted benefits that can encompass clean energy, mobility, weatherization, resilience and other local needs. Increasing program coordination between agencies on the back end will help to reduce harms and burdens to communities. By reducing redundancy and increasing efficiency, increased coordination and visioning between state agencies can also help improve standardization and streamlining of the application process, increase the effectiveness of outreach and engagement efforts to communities, and improve reporting procedures and evaluation metrics.

Identifying Burdens

CARB and CA state agencies can be more responsive to well-documented and established public health, environmental, economic and administrative burdens by identifying and directing set asides for historical marginalized communities and climate pollution “hot zones” in agency and investment plans. Dedicated set asides for under-resourced and historically under-invested communities and populations, particularly to Tribal, Black and Brown communities, rural and farmworker communities to support local community goals would enable communities to make more continual and sustained progress toward flexible and broadly defined local goals and not be left behind in competitive and limited-time funding cycles. Communities with limited resources and capacity most often lack access to participate in funding programs and also lack information and technical capacity to navigate complex funding applications. This approach would help overcome burdensome application processes, eligibility and data reporting requirements associated with state funding programs that are a major barrier that prevent the most under-resourced communities from accessing funding resources.

The goal should be to unlock available funding for priority populations to increase local participation in local climate action planning and expedite the delivery outcomes and benefits to communities that are most in need of investments. Many under-resourced communities waste limited time, capacity and resources on funding applications and project development that are not funded in competitive funding cycles that are oversubscribed. Funding for sustained community planning, community engagement and education would be a better way for the state to leverage local expertise towards climate action and progress towards state climate goals. Under CARB’s leadership, California should move away from the current model of one size fits all piecemeal programs that deliver one-time individual fragmented benefits and move towards more comprehensive and coordinated investment planning.

Avoiding Burdens

In addition to support and prioritization of community-level planning and dedicated set-aside funding for priority populations, another key way to prevent unintended harm to communities is to support expanding regional networks like Regional Climate Collaboratives and Regional Energy Networks to provide implementation and post-implementation support and program and project guidance. Increasing local community capacity for monitoring is also critical for understanding both short-term and long term impacts of a project or program. Other examples of burdens and harms that can be avoided with more comprehensive and coordinated investment planning:

Reduce community fatigue: Redundant agency programs, multiple solicitations and public meetings on discrete and narrow rulemakings and programs can create community fatigue, especially when communities do not clearly understand how different agencies, departments, rulemakings, plans and initiatives interact or what specific outcomes they are striving for.

Increase efficiency and coordination of advisory groups across state agencies: Numerous equity environmental justice and advisory groups are an excellent source for engaging impacted communities and gathering feedback, but across agencies and programs the recommendations of these groups become fragmented and not tied to coordinated outcomes on the ground.

Prioritize local job creation and training opportunities in state program funding: The economic benefits of capital investments should reach overburdened Black and Brown communities and communities most at risk and with least resources more directly, and not only contractors and consultants. These investments should translate into local jobs, re-training opportunities in regenerative sectors including habitat restoration, clean energy, industrial clean-up and remediation.

Include advance pay options: Program design and funding mechanisms should minimize administrative and economic burdens on communities and on applicants by eliminating reimbursement and first-come first served mechanisms for priority and target populations and adopting advanced pay.

One Stop Shop: Develop and operate a universal portal with coordination and at the back-end between agencies with data sharing agreements.

Flexible eligibility requirements: Strike a balance between requirements for shovel ready projects, matching funds, data and monitoring which can all have benefits and drawbacks that can exclude marginalized communities.

Incorporate feedback from past awardees: Conduct a comprehensive review and evaluation of agency funding plans and programs with community input.

More direct and streamlined funding to local governments: Increase alignment and coordination between local and statewide plans. While there is a lot of local and statewide planning that takes place in CA, there is an urgent need to utilize local land use, transportation, housing, climate and adaptation plans to inform investment priorities and plans.

Finally, we urge CARB to prioritize community-level place-based investment planning that provides sustainable funding for nature-based multi-benefit interdisciplinary and holistic programs and projects with demonstrated benefits to communities rather than costly and unproven technological solutions.

Sincerely,
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