

DOCKETED

Docket Number:	23-DECARB-01
Project Title:	Inflation Reduction Act Residential Energy Rebate Programs
TN #:	254196
Document Title:	Environmental Justice Committee of AAPI Equity Alliance Comments - Affordable nonprofit affordable housing. Eligibility for new households. Jobs for returning citizens. HOMES program
Description:	N/A
Filer:	System
Organization:	Environmental Justice Committee of AAPI Equity Alliance
Submitter Role:	Public
Submission Date:	1/26/2024 4:26:27 PM
Docketed Date:	1/26/2024

*Comment Received From: Environmental Justice Committee of AAPI Equity Alliance
Submitted On: 1/26/2024
Docket Number: 23-DECARB-01*

Affordable nonprofit affordable housing. Eligibility for new households. Jobs for returning citizens. HOMES program

HOMES program comment

Submitted by: Long Beach 350, the Environmental Justice Committee of AAPI Equity Alliance, and API RISE - Asian Pacific Islander Reentry & Inclusion Through Support & Empowerment

We recommend the following items for inclusion in the HOMES Program Plan funding application.

1. NEW HOUSEHOLDS SHOULD BE ELIGIBLE FOR REBATES. The definition of rebate eligibility for households should be designed to maximize participation and building energy retrofits.

When someone is a member of a household that received a rebate, then subsequently moves out and joins or forms another household, the new household should be qualified to receive its own rebates (as long as it meets other requirements).

Because eligibility for rebates is based on "households," the meaning of this criterion must be clarified to accommodate the changes in membership that all households will experience. The definitions should support maximum eligibility, and should not carelessly restrict rebates, and thus energy retrofits. (Please note that this recommendation does not involve income limits or the income verification process.)

The members of households change, and persons who leave go on to establish new households, which should be eligible for rebates. For example, consider the situations of households that receive a rebate and then sometime afterwards experience changes: adult children move out, a couple splits up, or one family in a multifamily household moves out, etc. The persons who have moved out join other households or establish their own new households, and they should be eligible for rebates. They should not be disqualified because they once lived in a household that received a rebate. The IRA program is in effect for ten years, and most households will change their membership during that time.

California's HOMES program eligibility rules should plan to accommodate those (and other similar) changes.

The goal of the IRA is to reduce greenhouse gas emissions from residences, which means retrofitting as many residential buildings as possible. Eligibility rules should help meet that goal, and should not be narrowly defined in ways that restrict rebates. Even if someone lives in more than one household that receives rebates, that building will have been retrofitted to reduce greenhouse gas emissions.

The principle of generous household eligibility should also be applied to the other IRA residential rebate program (HEEHRA/HEAR) because renters are able to use it protect the climate and their home living conditions. The decision on HOMES will probably set the precedent for HEEHRA implementation.

2. JOBS AND TRAINING FOR RETURNING CITIZENS SHOULD BE INCLUDED IN THE COMMUNITY BENEFITS PLAN. The state's funding application is required to include a Community Benefits plan, and programs for returning citizens is provided as an example in the federal application guidelines.

We would like to emphasize the crucial role that including hiring returning citizens in the Community Benefits plan can play in making the HOMES Program truly inclusive and environmentally restorative.

Returning citizens often face significant barriers to reintegration into society, including challenges in securing stable employment. By prioritizing the hiring of returning citizens, companies participating in the program can contribute substantially to the creation of opportunities for marginalized individuals. This approach aligns with the program's goal of fostering social equity and inclusion.

Moreover, we propose that companies demonstrating a commitment to hiring returning citizens should be granted substantial favor in terms of contracts with the program.

Recognizing and rewarding such efforts would not only incentivize companies to prioritize this demographic but also contribute to the larger objective of community development.

In addition to the social impact, the hiring of returning citizens can also play a vital role in climate restoration through energy efficiency initiatives. By providing meaningful employment opportunities to returning citizens, the program can contribute to a more sustainable and resilient community. This dual-purpose approach ensures that environmental restoration goes hand in hand with social progress.

We urge program organizers to consider these suggestions seriously and to take proactive steps in encouraging and incentivizing the hiring of returning citizens by participating companies. We believe that such a strategy will not only enrich the workforce but also amplify the positive impact of the program on both marginalized communities and our environment.

Thank you for your attention to this matter. We look forward to seeing the program become a model for comprehensive community development and climate restoration.

3. PRIORITIZE NONPROFIT-OWNED AFFORDABLE HOUSING, which is the best way to ensure that the upgraded dwellings are permanently available to low-income households. Doubled rebates are available to owners of multi-family housing with at least 50% LMI household, with a requirement to continue renting the unit/s to low-income tenants for at least two years. But the units can be rented to anyone after that, and thus be lost to low-income households. In contrast, nonprofit affordable housing organizations are devoted to keeping the housing permanently affordable. California should prioritize directing rebates to such organizations, with actions such as: allocating them a defined percentage of rebates, conducting targeted outreach and education, and providing technical services/workshops to assist with the application process.

Community land trusts with permanent affordability provisions should also be prioritized for rebates.

Thank you for your consideration.

Dean S. Toji (dtojienv@gmail.com) for
The Environmental Justice Committee of AAPI Equity Alliance