



beneficial state foundation

CALIFORNIA
OREGON
WASHINGTON

beneficialstate.org

Beneficial State Foundation

1438 Webster St.
Oakland, CA, 94612

California Air Resources Board

1001 I Street
Sacramento, CA, 95814

November 5, 2021

Dear California Air Resources Board and Staff,

As the statewide administrator of the Clean Vehicle Assistance Program (CVA Program), Beneficial State Foundation enthusiastically supports the *Proposed Fiscal Year 2021-22 Funding Plan for Clean Transportation Incentives* overall and we humbly provide our perspective on staff's recommendations for Financing Assistance for Lower Income Consumers. Most importantly, we appreciate CARB staff's efforts to prioritize equity outcomes in the design of the Financing Assistance Program, seen in the recommendation to shift to needs-based processing. A key learning from the pilot has been that a first-come, first-serve approach advantages higher-income individuals and deflects our limited resources away from the under-resourced individuals we aim to serve first. To achieve equity outcomes at scale, this program must take a targeted approach that intentionally advantages individuals and communities that have been disadvantaged due to their location, race, and socio-economic circumstances. We look forward to working closely with CARB staff to develop and implement a needs-based approach that delivers equity outcomes statewide.

The funding allocation of \$23.5 million will enable the program to reopen in 2022 and deliver on the mission to help lower-income Californians access affordable clean vehicles. We support and appreciate CARB staff's recommendation to continue funding this program. Since reopening the CVA Program in February 2020, we have deployed over \$22 million to roughly 4,000 lower-income individuals through vehicle and charging grants. We project that in 2022 we will be able to serve 2,470 people with the available funding. If we award grants at the pace that we did in 2021, we could run out of funding in 5 months. Therefore, we hope to work closely with CARB staff to design and implement innovative, customer-centered



strategies that will enable the CVA Program to stay open for as long as possible with the available funding. We encourage the board to consider funding this program at a much higher level in the next funding cycle to meet the demand seen in the pilot and ensure that the program remains open continuously.

The “Other Changes” that CARB staff recommend are intended to ensure limited funds are directed toward those who need them most and support the needs-based approach. We strongly support this goal and believe the recommended flexibility is critical as we develop a needs-based approach. We encourage the board to allow the program to remain flexible in regards to additional eligibility criteria. We look forward to working closely with CARB staff to ensure that all new program criteria are equitable and support the needs-based approach.

Finally, Beneficial State Foundation would like to commend CARB staff for their thoughtful engagement of community stakeholders in the funding plan development process. Overall, we are in strong support of the *Proposed Fiscal Year 2021-22 Funding Plan for Clean Transportation Incentives*. We look forward to working with CARB staff, community partners, and other program administrators to implement the recommendations and ensure statewide equity outcomes through successful administration of the Clean Vehicle Assistance Program.

Thank you,

Erin Kilmer-Neel
Executive Director and Chief Impact Officer
Beneficial State Foundation