LEADERSHIP COUNSEL FOR JUSTICE & ACCOUNTABILITY

A Tides Center Project

October 22, 2018

Sent Via Email

The Honorable Mary D. Nichols
Chair, California Air Resource Board
1001 I Street
Sacramento, CA 95814

RE: Proposed Fiscal Year 2018-19 Funding Plan for Clean Transportation Incentives; Low Carbon Transportation Investments and the Air Quality Improvement Program

Dear Chair Nichols and Board Members:

Thank you for the opportunity to provide comments on the Proposed Funding Plan for Clean Transportation Incentives for Fiscal Year 2018-19.

Leadership Counsel for Justice and Accountability works alongside the most impacted communities in the San Joaquin and Coachella Valleys to advocate for sound policy and equitable transportation investments in low-income communities overburdened by air quality impacts. The recommendations set forth in this letter reflect the priorities expressed by community residents that resulted from numerous community meetings pertaining to climate resiliency efforts and public investments in low-income communities of color.

We would like to thank the California Air Resource Board for the following project additions and staff commitments to help reduce GHG emissions and maximize investments in low-income communities:

- An initial set-aside requirement of $25 million funds for increased rebates for low-income recipients.
- CARB's commitments highlighted in the staff's proposal to maximizing benefits to low-income communities.
- The inclusion of the Car Sharing and Mobility Option Program, Financing Assistance for Lower-Income Consumers, Agricultural Worker Vanpools, Rural School Bus Pilot Program, and the Clean Mobility in Schools program

Through these comments and our continued participation in the transportation investment plans, Leadership Counsel aims to ensure that the California Air Resource Board (CARB) considers and develops sustainable and equitable transportation investments and policies based on community-identified priorities in low-income, disadvantaged communities. The prioritization of

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clean transportation investments in communities most overburdened by air pollution will help California transition to clean and renewable energy sources and reduce our dependence on polluting fuels. These investments can result in significant GHG emission reductions and benefits to low-income, disadvantaged communities.

I. Recommended Changes To The Car Sharing and Mobility And Financing Assistance For Lower-Income Program

A. Ten Year Funding Commitment For Ongoing And New Car Sharing and Mobility Transit Services In Rural Communities

The draft plan indicates that through community input received through the SB 350 low-income barriers report efforts, CARB found that mobility needs for low-income residents and disadvantaged communities "*are not the same in all disadvantaged communities and it is very important to provide various options in order to be flexible and responsive to the transportation needs of specific communities.*" As such, the differences in transportation mobility needs and transit deficiencies in low-income and disadvantaged communities must be addressed accordingly and funded appropriately. We recommend that the Car Sharing and Mobility Option Program be adjusted to include a commitment for ten-years of funding for electric rural vanpool and car share programs in low-income, rural, disadvantaged communities in the San Joaquin Valley, Coachella Valley, the Central Coast, and Northern California to ensure community sustainability and shifts to climate resilient transportation. Currently CARB proposes a yearly fiscal funding plan with set-asides and staff recommendations for certain projects. While yearly set asides work for certain programs, others like the Car Sharing and Mobility Program require a long-term funding plan to ensure ongoing sustainability of existing programs with limited and restricting resources. A ten year funding commitment will help transition successful short-term pilot programs into long term programs that serve community needs and develop sustainable funding models. For example, the rural unincorporated community of Cantua initiated a pilot car share program through a one-time investment grant. Following the termination of this funding grant, the community had to secure additional funds from other funding sources to ensure the sustainability of the project, only after the van was taken out of service for several weeks.

Additionally, community-based advocates and Green Commuter have identified Merced and Fresno county for zero-emission car share programs to serve as alternative transit options for low-income communities. To overcome the multiple mobility barriers faced by low-income, disadvantaged communities and increase access to clean mobility options CARB must create a sustainable funding process that will result in the operation and sustainability of these community-identified projects. A sustainable funding source would strengthen these programs and secure their longevity.

B. Financing Assistance For Lower-Income Consumers Program Should Include Funding For Community Outreach And Events

We recommend that the Financing Assistance for Lower-income Consumers program include a funded community outreach component. Investment in community outreach would help reach

historically underserved communities with low-levels of information and education on zero-emission vehicle technology and financial assistance opportunities, which in turn will expand participation among lower income residents in the transition to clean energy transportation. Lack of access to information remains a critical barrier to accessing clean energy transportation for to residents in disadvantaged communities, and in particular rural disadvantaged communities.

II. Increase Set-Aside Investment For The Rebate Program For Low-Income Recipients And Restructure Eligibility Requirements

We thank CARB for committing a set-aside requirement of $25 million in funds for increased rebates for low-income recipients. However, we recommend targeting rebates to lower income residents as discussed below and recommend an increase from 22% to 35% for investments in disadvantaged communities as defined by AB 1550 and AB 535. Low-income residents and disadvantaged communities face multiple structural, policy, and program barriers that limit their access to clean energy technology. Continues investment in low-income communities will facilitate participation in clean energy programs.

The income cap for individual applicants applying for CVRP rebates is $150,000 for single filers, $204,000 for head-of-household filer, and $300,000 for joint filers. While we understand that all Californian's should have access and opportunity to ZEV technology, we do not believe the limited resources offered by the state should be prioritized to high income earners who have the means to purchase a ZEV without the support of added subsidies. According to the U.S. Department of Numbers, the average median household income in California is $67,739. This average does not reflect the average income threshold identified by CARB in the CVRP assistance program. To accurately reflect the financial need of all Californians, we recommend that 80% of these funds be granted to households at or below 100% of state median income, 60% of these fund should target households at or below 300% the Federal Poverty Line, and 40% of funds should target households at or below 200% state median household income.

III. Develop Sustainable Job Creation Policies For A Rural Vanpool Program And Expand Eligibility Beyond Agricultural Workers.

We thank CARB for selecting the San Joaquin Valley as the grantee for the Agricultural Worker Vanpool Pilot Project and for proposing an additional $3 million for fiscal year 2018-19 projects that benefit disadvantaged communities However, we recommend that the program expand beyond the San Joaquin Valley and encompass rural transportation needs beyond agricultural workers, including the tourism sector and educational opportunities. Accordingly, we recommend that $25 million of the total CVRP funds be reallocated to the Rural Worker Vanpool Program during next five years to ensure the program's success and equitable investments in a program that directly impacts low-income communities of color. The Rural Vanpool program will address many of the transportation gaps that exist in rural California and provide alternative green transit options to farmworkers with transportation scarcities.

The Sunline Transit Agency in the Eastern Coachella Valley, for example, established a farmworker vanpool program called SolVans. This program provides an affordable and environmentally friendly rideshare program for farmworkers, community college students, and workers in the tourist and hospitality industries. For individuals in the Eastern Coachella Valley who do not have direct access to a single occupancy vehicle, these type of programs provide a lifeline to educational and job opportunities, health services, and other resources not readily accessible in rural communities. Despite SolVans being in its early stages of implementation, this program serves as a model for future innovative, community-identified transit options that should be prioritized for continued investment.

As previously stated, we recommend that CARB established vanpool programs to ensure long-term sustainability. In addition, we recommend that funding contracts include local hire policies to ensure local hire of residents in low-income communities to create co-benefits for these neighborhoods.

IV. Increase Investment In Schools Located In Rural, Low-Income Communities With High Levels Of Exposure To Traffic-Related Pollution.

A. Prioritize Rural School Bus Pilot Program Funds in Disadvantaged Communities With High Levels Of Pollution And Outdated School Bus Inventory

In order to meet California's aggressive climate goals and reduce our carbon footprint, we need to accelerate the conversion of California's school bus fleets to 100% zero-emission and renewable-fueled energy. CARB must ensure that communities exposed to the highest levels of traffic-related air pollution are prioritized for funding. According to the 2018 American Lung Association's annual "State of the Air" report, Bakersfield, Visalia-Porterville-Hanford, Fresno-Madera, Modesto and Merced, are among the top 10 most polluted cities by Ozone, Short-term Particle pollution, and year-round Particle pollution.[1] The goal of the Rural School Bus Pilot program is to provide immediate GHG emissions reductions and reduce school children's exposure to cancer-causing and smog-forming pollution. As such, investments should be prioritized in areas with high levels of pollution and highest concentration of school buses manufactured prior to 1977 that do not meet federal motor vehicle safety standards and were not subject to oxides or nitrogen and PM emission control. [2]

B. Prioritize Funding Green Air Quality Buffers in Schools Located In Disadvantaged Communities To Reduce Near-Road Pollution Exposure

The Clean Mobility in Schools Pilot Program serves as an excellent opportunity to reduce near-road pollution exposure in schools located in low-income, disadvantaged communities. In addition to staff's proposal to fund both light-duty and heavy-duty zero-emission vehicles, charging infrastructure, active transportation projects, and synergistic GHG emission reduction projects, we recommend the installation of green buffers such as additional greening, and other proven methods to mitigate certain air pollutants in close proximity to schools.[3] For example, Jane Addams Elementary in Fresno is located immediately next to the highly trafficked highway

99 and other commercial and industrial-like building that further exacerbates the safety, mental, and physical wellbeing of students and surrounding communities. According to the National Agroforestry Center, vegetation in buffers can help local and regional air quality by reducing temperature, removing air pollutants, and creating energy effects on buildings. The effects of vegetation on air pollution can help mitigate some of the traffic-related health impacts in communities.

VI. Re-Allocate 25 Million Of The CVRP Investments To Fund ZEV Rebates For Public Fleet Such As School Buses And Trucks And Re-structure CVRP Eligible Income Threshold

A. Public Fleet Incentives For CVRP Eligible Vehicles To Maximize Benefits To Low-Income Disadvantaged Communities.

The California Vehicle Rebate Project should prioritize subsidies for clean energy used vehicles that provide payment options for low-income residents. Offering subsidies for used vehicles must go beyond the California Air Pollution Control Laws vehicle code that defines new vehicle eligibility. For example, CARB eligibility requirement state that in addition to meeting the vehicle code, vehicles must have an odometer reading below 7,500 miles at the time of purchase or lease. We recommend that these eligibilities be more flexible for resident seeking to purchase a clean energy vehicle with less than 15,000 miles.

B. Re-Allocate 25 Million Of The CVRP Program Funding Allocation To Increase ZEV Rebates For School Buses And Trucks In Low-Income Communities

The San Joaquin and Eastern Coachella Valley are heavily impacted by traffic-related pollution resulting from direct exposure from major highways like Highway 99 in the valley and Highway 86 and Interstate 10 in Coachella. The close proximity of these highways to nearby communities continues to exacerbate the health and air quality impacts of many low-income disadvantaged communities. We recommend a transfer of 25 million dollars from the CVRP program to the ZEV rebates for public Fleet Program to fund old school fleets in low-income communities and trucks heavily used for commercial and Industrial purposed traveling to and from the highways mentioned above.

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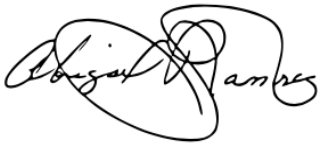
We appreciate the opportunity to comment and look forward to continuing working together in the development of equitable and sustainable transportation Incentives. If you have any questions with respect to these comments, you can reach me at aramirez@leadershipcounsel.org.

Sincerely,



Abigail Ramirez
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[1] American Lung Association, 2018. State of the Air;
https://www.lung.org/assets/documents/healthy-air/state-of-the-air/sota-2018-full.pdf

[2] *See* Air Resource Board, 2008. Lower-emission School Bus Program. P. 3
https://www.arb.ca.gov/bonds/schoolbus/guidelines/2008lesbp_rev_12_20_11.pdf
[3] https://www.fs.usda.gov/nac/buffers/guidelines/6_aesthetics/3.html