



December 7, 2020

California Air Resources Board
1001 I Street
Sacramento, California 95814

**Re: Support for 2020-2021 FUNDING PLAN FOR CLEAN TRANSPORTATION
INCENTIVES**

Dear Board Members:

The Coalition for Clean Air is pleased to support this year's clean transportation funding plan.

We support the proposed allocation of AQIP funds.

HVIP has a waiting list, and provides important support to the Innovative Clean Transit and Advanced Clean Trucks rules. Clean Cars 4 All is a highly popular project that helps low-income drivers scrap gross polluters and replace them with advanced clean cars or an alternative mobility option. Funding has been almost exhausted in some areas, so this small allocation can provide a vital bridge until additional funds are budgeted.

We support the proposed contingency spending authorization of the Executive Officer.

Because the Legislature has not yet allocated any Greenhouse Gas Reduction Funds for the current budget year, CARB will have to move quickly when lawmakers act. Therefore, providing some discretion to the Executive Officer could prevent some projects from going dark in the period before the next Funding Plan is adopted. Such a gap in funding would be a setback for Californians who benefit from the projects – especially for those in disadvantaged and low-income communities – and would delay needed emission reductions.

We urge CARB to give air districts flexibility in spending their CC4A funds.

In order to maintain program continuity while waiting for the Legislature and Governor to allocate more funds through the budget process, it is important that CARB give air districts flexibility in using their Clean Cars 4 All funds. This flexibility will allow the districts to keep their programs alive and avoid a stop and start scenario that would disrupt service to disadvantaged communities.

We support HVIP voucher limits.

Given that HVIP is over-subscribed and funding is scarce, program changes are necessary to prevent a concentration of vouchers in small numbers of fleets and manufacturers. Therefore, we

support the limits of 30 vouchers per fleet and 50 vouchers per drayage fleet. We also agree that manufacturers should be capped. The proposed soft cap of 100 vouchers per manufacturer may even be on the high side.

We support proposed program changes to CVRP for Plug-In Hybrid Electric Vehicles.

We agree with the proposal, consistent with last year's Board direction, to increase the electric range requirements for plug-in hybrids: the state should subsidize only those PHEVs that are designed to have most of their driving be zero-emission, and the proposed minimum of 30 miles of electric range was achieved years ago by a minivan. We also support the proposed shift to using EPA mileage figures to calculate PHEV electric range: the EPA figures are the ones consumers are familiar with and give a much better estimate of on-road results than do the UDDS numbers.

CARB should transition CVRP to low-moderate income only and shift Low-Carbon Transportation Funds to equity projects and medium-heavy-duty projects.

With the advent of the Clean Fuels Reward Program, CVRP's limited funds should be directed to low and moderate income households who most need the state's assistance to make a ZEV purchase. The remainder of funding that has been going to CVRP should be invested instead in the much-needed projects that incentivize medium and heavy-duty vehicles and transportation equity for priority populations. CARB should plan for a phase-down in CVRP.

Thank you for considering our views.

Respectfully,

A handwritten signature in black ink that reads "Bill Magavern". The signature is written in a cursive, flowing style.

Bill Magavern
Policy Director