



November 18, 2019

Clerk of the Board
California Air Resources Board
1001 I Street
Sacramento, California 95814

Re: Item **lcfs2019**, November 21, 2019 Board Meeting
Proposed Amendments to the Low Carbon Fuel Standard Regulation

Dear Members of the California Air Resources Board (CARB):

GRID Alternatives (GRID) submits the following comments regarding the *Proposed Amendments to the Low Carbon Fuel Standard Regulation* (LCFS). GRID serves as the statewide administrator for CARB's One-Stop-Shop Pilot Project; serves as part of the statewide administration team for CARB's Clean Mobility Options Voucher Pilot Program; and is an implementation partner on multiple additional CARB Low Carbon Transportation Equity programs. GRID supports the proposed amendments, and provides the following comments and recommendations to ensure that these new equity investments proposed for LCFS are coordinated with CARB's existing equity investments in clean transportation:

I. The new LCFS environmental justice amendments should reflect CARB's guidance from its SB 350 Barriers Study.

GRID strongly supports the proposed new environmental justice amendments to the LCFS regulation, and applauds CARB's deep commitment to equity. Our only concern is the need to ensure that these new investments for low-income consumers and disadvantaged communities are well coordinated with CARB's existing equity programming. This need for this coordination comes directly from CARB's own [SB 350 Low-Income Barriers Study Guidance Document](#) on the barriers low-income residents, including those in disadvantaged communities, face in accessing clean transportation and mobility options.¹

While low-income Californians have access to a wide range of incentives for clean transportation and related climate equity programs, they often struggle to navigate many different agencies and different application processes to determine which programs they are eligible for, which technologies best meet their needs, and which incentives can be combined or stacked. In addition, low-income families face additional barriers to program participation involving technology, language, trust, and the time constraints faced by people working multiple jobs to make ends meet. These barriers must be addressed to ensure that California meets its ZEV deployment and environmental justice goals, while maximizing efficient use of public dollars by ensuring that equity programs are leveraging each others' investments.

¹ https://ww2.arb.ca.gov/sites/default/files/2018-08/sb350_final_guidance_document_022118.pdf

The SB 350 Barriers Study calls for a coordinated application process and coordinated community outreach to ensure that low-income communities have easy access to all of the funding they are eligible for. CARB is now implementing these recommendations from this guidance document through the One-Stop-Shop Pilot Project, as well as through CARB's [SB 350 Outreach Strategic Roadmap](#).² These initiatives serve as a natural foundation to ensure that new transportation electrification programs serving low-income and disadvantaged communities can be coordinated with existing ones.

II. To reflect this guidance, CARB should require that new LCFS-funded investments serving low-income and disadvantaged communities be coordinated with CARB's existing equity incentives, and with equity programs from other agencies.

GRID Alternatives recommends that CARB require that transportation electrification projects that are used to meet the environmental justice requirements for LCFS holdback credits be coordinated with CARB's existing equity investments. CARB's One-Stop-Shop Pilot Project provides a natural mechanism for this coordination, but coordination could also take place through other means. Preferably, electric distribution utilities (EDUs) should also be required to coordinate their projects with existing equity investments in transportation electrification from other agencies as well, such as the California Energy Commission. Coordination will increase transportation electrification in low-income communities by providing more comprehensive solutions; ensure cost effectiveness by maximizing funding leverage; and address the risk of duplicative or confusing programming that could accidentally increase barriers to access for low-income households.

This requirement can be structured in a flexible way, consistent with the flexibility that the proposed amendments provide EDUs to propose different low-income programs that meet the needs of local communities. One option would be to require that EDUs include documentation in their annual report submitted to CARB of how their equity projects are being coordinated with existing low-income transportation equity programs from CARB and other agencies, but provide flexibility to EDUs to determine what that coordination looks like on a project-by-project basis.

GRID appreciates the opportunity to provide these comments on this important regulation. We look forward to continue working with CARB to ensure that low-income families throughout the state have robust and equitable access to California's low-carbon transportation investments.

Sincerely,



Zach Franklin
Chief Strategy Officer
GRID Alternatives

² <https://ww2.arb.ca.gov/sb-350-outreach-strategic-roadmap>