



October 18, 2019

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

Re: Item **ap2019**, October 24, 2019 Board Meeting  
*Proposed Additional Requirement for Advance Payment of Certain Funds Regulation*

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

GRID Alternatives (GRID) submits the following comments regarding the Proposed Additional Requirement for Advance Payment of Certain Funds Regulation (“Advance Payment”). GRID serves as the statewide administrator for CARB’s One-Stop-Shop Pilot Project, and also serves as a subcontractor on multiple additional CARB Low Carbon Transportation Equity programs. GRID supports the overall goals of the proposed regulation and provides the following comments for how Advance Payment can be improved to ensure maximum benefit for CARB and its grantees.

**I. The Advance Payment process and structure should be streamlined to be more accessible to participating nonprofit organizations.**

Nonprofits participating in Advance Payment should have access to a simplified and streamlined implementation process and structure, instead of the current structure which creates significant costs and barriers in terms of paperwork and reporting requirements, and which has a long lead time for agencies to receive Advance Payment funds. While larger agencies may have the extra staff to cover these administrative costs, and the financial capacity to float these expenses while waiting for reimbursement, smaller nonprofit organizations do not. From an equity perspective, improvements to the Advance Payment process would create significant benefits in terms of expanding the universe of organizations in disadvantaged communities that are able to contract with CARB in the first place, in line with CARB’s broader goals for expanding partnerships and investments in these communities.

**II. Nonprofits who qualify for Advance Payment should be permitted to provide advance payment to other entities, similar to what is allowed under these regulations for air districts.**

In that same vein, CARB should modify the language in the proposed regulation and explicitly allow nonprofit grantees who have qualified for Advance Payment the ability to provide advance payment to other entities. CARB’s current proposed language appears to only provide this permission for air

districts, even though nonprofits have a greater need for this flexibility for the reasons described above. This modification will not only make it easier for CARB to work more with community-based grantees, but will also help CARB's nonprofit grantees more easily subcontract with grassroots CBOs in disadvantaged communities that have even more limited resources. We believe this would be a significant win for CARB's broader goals around environmental justice and equity.

GRID appreciates the opportunity to provide these comments on this important regulation. Please do not hesitate to contact us should you require any additional information or have any questions regarding these comments. 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,

A handwritten signature in black ink, appearing to read "Zach", with a long horizontal flourish extending to the right.

Zach Franklin  
Chief Strategy Officer  
GRID Alternatives