



COMITE CIVICO DEL VALLE, INC.
INFORMED PEOPLE BUILD HEALTHY COMMUNITIES
www.ccvhealth.org

November 19, 2024

California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Clean Transportation Incentives Funding Plan - Comment Letter

Dear Chair Randolph and ARB Members:

On behalf of Comit  Civico del Valle, we are submitting this comment letter in support of ARB's Driving Clean Assistance Program (DCAP) that has launched in Imperial County and continue to roll out through the remaining parts of the state. This program is expanding access to the Clean Cars 4 All (CC4A) program to air districts that do not offer CC4A at the local level.

CCV is a nonprofit organization that prioritizes environmental justice, civic participation and engagement, along with grassroots capacity building for the communities we serve. CCV stands firm in our mission to amplify the voice of underserved communities of the Imperial Valley, and all the other unincorporated communities in the Salton Sea region. The Imperial Valley is an overlooked community for investment, historically plagued with the highest unemployment rates in the country and one of the most disproportionately impacted COVID-19 regions. Imperial Valley has the lowest electric vehicle (EV) chargers per capita in the State of California but is poised to be a critical resource area for electrification minerals.

Last year, Comit  Civico del Valle (CCV) successfully launched the **First 40 Campaign** - a community-led initiative for much-needed EV charging infrastructure by installing its first publicly accessible charging station in the City of Brawley. This year we were the first organization to navigate through the CALeVIP program and install eight DC Fast Chargers in the Imperial Valley with another eight to launch in January 2025. CCV's mission is to install a total of 40 charging stations within Imperial County to produce local green jobs, boost tourism, and create STEM education opportunities, all while reducing harmful air pollution. CCV, and many of its partner organizations, are striving to achieve EV equity and environmental justice for our disadvantaged communities in the Salton Sea-California Border region.

It is important that we protect programs like DCAP. Low income and disadvantaged communities outside of implementing air districts have received \$0 funding from CC4A until



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now – the Statewide program is intended to help reach areas that have not yet been supported by the States ZEV incentives.

We believe that the best policy is to ensure that all ZEV equity incentive programs, including both the air district administered Clean Cars 4 All (CC4A) programs and the statewide Drive Clean Assistance Program (DCAP), be sustained with existing funding so they can provide ZEV benefits equitably to communities throughout California. We recognize that this will require CARB to make a difficult choice to shift funding that was committed to the statewide DCAP program to the district CC4A programs. However, we believe if CARB applies the draft CC4A allocation formula to the remaining funding, all these programs will be able to stay open for the coming fiscal year and beyond. We recommend using the proposed formula, incorporating recommendations made by the air districts, to allocate an initial \$100 million of the remaining funding between DCAP and the five air district administered CC4A programs. We recommend using the remaining funds as a reserve fund, so that when DCAP or any of the air district administered CC4A programs reach 75% utilization, an additional \$20 million can be distributed to said program so that it can continue operations without interruption and better serve priority communities across California.

Luis Olmedo
Executive Director