



December 9, 2020

California Air Resources Board  
1001 I Street  
Sacramento, CA 95814  
cotb@arb.ca.gov

**RE: Agenda Item 20-13-7: Proposed Fiscal Year 2020-2021 Funding Plan for Clean Transportation Incentives**

Dear Chair Nichols and Members of the Board,

The Los Angeles County Electric Truck and Bus Coalition works to advance the adoption of zero-emission buses, trucks, and other vehicles over polluting fossil fuel vehicles, while at the same time creating equitable economic growth and quality local jobs through these vehicles and associated infrastructure. We also support ensuring that low-income communities of color that have for so long breathed some of the dirtiest air in the nation receive the benefits of zero-emissions technology first.

This year brought the worst string of air quality days in California since the 1990s. Southern California residents breathed dirty air that violated federal ozone standards a record 157 days so far in 2020. There has never been more of a need to double down on zero-emissions investments because the science is clear that combustion technologies are not adequate to meet our air quality and climate goals. The California Air Resources Board's leadership in adopting strong zero-emission rules and the Governor's Executive Order N-79-20 set a clear course for a zero-emissions future, making the need to transform the transportation sector to zero-emissions undeniable.

Overall, our Coalition is supportive of Staff's proposal to invest the \$28 million available Clean Transportation Incentive funds in the Hybrid and Zero-Emission Truck and Bus Voucher Incentive Project (HVIP) and the Clean Cars 4 All program because these programs play an important role in cleaning California's air. We ask the Board to adopt Staff's proposal with some suggested modifications.

First, we would like to see that 100 percent of the available funding go toward the transition to and adoption of zero-emission technologies. At a time when public funds are so scarce, there is no reason for the agency to sink limited public funds into combustion vehicles, particularly since California's path to zero-emissions is so clear. We ask that the Governor's unequivocal commitment to a zero-emissions future be fully reflected in the allocation of this funding.

Second, we are pleased to see Staff's inclusion of voucher modifiers for HVIP projects benefitting disadvantaged communities and transit agencies that need these funds most. However, we suggest that the disadvantaged communities multiplier be greater than 10%. Disadvantaged communities continue to suffer the most from dirty air, and the benefits of a zero-emissions transition must center the frontline communities that have borne the cost of this public



health air quality crisis. Likewise, if the Board agrees that all funding should go toward zero-emission technologies, the negative multiplier for plug-in hybrids can be removed.

Third, our Coalition supports that the remaining \$3 million in funding be allocated to the Clean Cars 4 All program to provide incentives to lower-income communities living in and near disadvantaged communities to purchase new or used plug-in hybrid or zero-emission replacement vehicles. We ask the Board to commit most if not all of the Clean Cars 4 All funds to new or used zero-emissions replacement vehicles.

Finally, we would like to see CARB develop procedures to certify that manufacturers eligible for HVIP or Clean Cars 4 All vouchers be fair and responsible in their treatment of workers, create high quality, family sustaining jobs and create pathways to manufacturing jobs for disadvantaged communities.

At a time when funding is limited and the need for clean air is great, every dollar of public funding should go toward this monumental and much-needed transition to zero-emissions. We thank Staff and the Board for its commitment to protecting public health and cleaning the air.

Sincerely,

Los Angeles County Electric Truck & Bus Coalition

*[The Los Angeles County Electric Truck and Bus Coalition](#) brings together leading voices from clean energy, organized labor, environment, and neighborhood community groups to build a broad movement that supports a 100% electric fleet for Los Angeles County.*