



May 18, 2018

Chairman Mary Nichols  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

Re: Comments on CA Planning for VW Beneficiary Mitigation Plan

Dear Chairman Nichols:

On behalf of LA n Sync at the California Community Foundation and our partners – the County of Los Angeles, the City of Los Angeles, Climate Resolve, Global Green, and the Playa Group – we want to thank you for the opportunity to submit comments on the proposed VW Beneficiary Mitigation Planning as it looks to best allocate \$423 million in diesel mitigation funding. As you know, Los Angeles County is home to more than 50% of the state's top 25% of disadvantaged communities according to the state's CalEnviroScreen 3.0 – the majority of whom have been disproportionately impacted by diesel pollution (the key focus of the VW settlement). We also want to thank you for holding one of your meetings in Los Angeles as it is absolutely essential that members of the Los Angeles community engage with the Board and staff frequently to ensure the best projects and ideas move forward.

LA n Sync, a cross-sector collaborative that unites the academic, philanthropic, nonprofit, public, and private sectors across LA County to pursue investment for our community, is actively working to improve public health, economic outcomes, and overall living conditions within the county. In November, a coalition organized by LA n Sync submitted a comment letter on what we thought the state should do in terms of priorities for the Environmental Mitigation Trust. One of the things we requested was that at least one of the next workshops be held in Los Angeles, so thank you for hearing us on that request. We appreciated the opportunity to host and welcome additional opportunities to do so in the future.

We wanted to ensure we provided the below comments on where we feel the plan could improve to maximize its potential for impact.

1. **Los Angeles County should receive a majority of funding from the VW Environmental Mitigation Trust due to diesel pollution burden faced here.** In our letter, we recommended that Environmental Mitigation Trust funding be allocated to areas that were most impacted by Volkswagen's actions. All of your data shows that no place within the state has been harder hit from VW's diesel cheating than those of us here in the South Coast air basin. In fact, nowhere comes close. Now we understand and appreciate that this program is meant to reduce NOx. However, to truly mitigate the NOx emissions, CARB should mitigate these emissions where they occurred. There are other CARB and California programs that provide opportunities for statewide vehicle replacements. We believe that the *funds from the Environmental Mitigation Trust should be centered on undoing the harm in the communities that were most impacted by the deceit to begin with.*
  - Los Angeles County is home to over 50% of the state's top 25% of disadvantaged communities as ranked by CalEnviroScreen 3.0, as well as home to over 60% of the state's top 10% of disadvantaged communities. These communities have been disproportionately impacted by diesel pollution— and they are the reason California was allocated \$423 million of funding for the Environmental Mitigation Trust within the state.
2. **California should ensure that smaller cities and smaller companies have an equal opportunity to receive funding for vehicle replacements and charging infrastructure.** We want to express concerns with a straight first come, first served program approach for funding vehicle replacements and would encourage some alternative approach that reserves funding for small businesses and small cities to ensure that those that may need the funding the most have equitable access, especially as these smaller entities may have less staff capacity to respond quickly to any solicitation. The state has precedent for this kind of funding with the California Competes Tax Credit, which is administered by the Governor's Office of Business and Economic Development.



3. **California should make it easy to stack other funding sources to leverage these VW funds and ensure they go further.** To ensure maximum project deployment, we would encourage that the state simplify the leverage of funding sources. For example, if electric school buses are funded, we should encourage the use of HVIP funds as well. This way we can maximize the number of clean school buses on our roads.

In addition to the above, we also want to recommend several components that we feel were not addressed in the plan before you but will be very valuable as you further develop the plan’s individual programs.

1. **California should leverage the economic potential for attracting, retaining, and growing the equipment and vehicle producers in-state through some sort of preference/prioritization for localized production.** California has a unique opportunity to be an economic leader as well as an environmental leader through the distribution of these funds. Considering California has the largest manufacturing sector in the country, we would encourage the development of a preference mechanism for equipment that is produced within the state of California to ensure that state economic benefits are maximized.
2. **California should prioritize areas that have already gone through planning for the deployment of cleaner vehicle technologies and infrastructure.** Successful deployment of cleaner vehicle technologies and infrastructure requires advanced planning. We hope additional consideration/support will be provided to those with already established plans and projects that are shovel-ready, thereby maximizing the benefits able to be realized by these funds.
3. **California should allocate up to 15% for clean fueling infrastructure deployment so that it further helps transportation electrification in disadvantaged communities.** We would encourage a program that augments the Enhanced Fleet Modernization Program (EFMP) and allows for the deployment of infrastructure in disadvantaged communities, specifically targeting areas rich with multifamily housing. This would help augment the funding from Electrify America.
4. **California should support more meaningful community engagement in the deployment of VW funding.** We hope that CARB will go beyond simply involving a community organization in an application, and instead engaging community organizations throughout the process to ensure the best projects that most benefit the community can move forward.
5. **CARB should have future workshops on VW funding program development in Los Angeles.** LA n Sync would like to invite CARB to have several future meetings on the Environmental Mitigation Trust individual program planning in Los Angeles to enable more of our residents, businesses, and communities to actively participate. Furthermore, we would also like to invite you to have more Board meetings in Los Angeles on topics such as the adoption of the plan, and have sent a letter to the Board requesting as such. LA n Sync is happy to coordinate to ensure the meetings are easily facilitated and successful.

We are supportive of CARB’s goals to use these funds to accelerate the cleanest vehicle deployments possible, and we are hopeful that these impacts will be felt in Los Angeles most of all. Please do not hesitate to reach out to LA n Sync’s Program Officer, Ellah Ronen, at [eronen@calfund.org](mailto:eronen@calfund.org) as you move throughout this process.

Thank you in advance for your consideration, and we look forward to continuing to engage with you throughout the plan’s program development.

Sincerely,

**Antonia Hernandez**  
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California Community Foundation

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Chief Sustainability Officer  
County of Los Angeles

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