



November 9, 2017

Lisa Williams, Mobile Source Control Division  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

Re: Comments on CA Planning for VW Beneficiary Mitigation Plan

Dear Ms. Williams:

On behalf of LA n Sync at the California Community Foundation and our partners – Climate Resolve, the County of Los Angeles Internal Services Department, Fixing Angelenos Stuck in Traffic, LA Business Council, LA Cleantech Incubator, Los Angeles County Economic Development Corporation, LA Metro, The Playa Group, and the Port of Long Beach – we want to thank you for the opportunity to submit comments on the process and suggested priorities for the state during this initial phase of 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).

LA n Sync, a cross-sector collaborative that unites the academic, philanthropic, nonprofit, public, and private sectors in LA County to pursue investment for our community, is actively working to improve public health, economic outcomes, and overall living conditions within the county. As such, we have the following comments we would like to submit into the record and would encourage you and your team to reach out to us should you have any questions or need any additional information on these suggestions.

1. **Los Angeles County should receive a majority of funding from the VW Environmental Mitigation Trust due to diesel pollution burden faced here.** In the past, cases have been made to distribute funding based on population or other allocation methods, throughout the state. Since these funds are mitigation funds to “right the wrong” caused by VW’s emissions cheating, *it is imperative that CARB focus these funds on those areas hardest hit by diesel pollution.* We would encourage a distribution structure that focuses on prioritizing these communities.
  - 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 CA was allocated \$423 of funding for the Environmental Mitigation Trust within the state.
2. **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 in addition to being an environmental leader through the distribution of these funds. Considering California has the largest manufacturing sector in the country, would encourage the consideration of a preference mechanism for equipment that is produced within the state of California to ensure that economic benefits are maximized.
3. **California should ensure that smaller cities and smaller companies have an equal opportunity to receive funding for vehicle replacements and charging infrastructure.** We would like to ensure that smaller cities and companies, which don’t typically compete for grant funds due to the complexity of the process are able to receive funding. As such, we hope you would consider nonprofits an eligible applicant that could work to aggregate these applications on behalf of multiple end users.
4. **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.
5. **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.



6. 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 adjacent to multifamily housing. This would help augment the funding from Electrify America.
7. 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; but, engaging community organizations throughout the process to ensure the best projects that most benefit the community can move forward.
8. CARB should have future workshops on VW funding in Los Angeles. LA n Sync would like to invite CARB to have another meeting on the Environmental Mitigation Trust 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 in order to ensure the meetings are easily facilitated and successful.

LA n Sync is happy to work with a member of your team to develop language that helps incorporate these suggestions into the plan and also to answer any questions you may have. 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 VW planning process.

Sincerely,

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Senior VP & COO  
California Community Foundation

**Bryn Lindblad**  
Associate Director  
Climate Resolve

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Cc: Peter Christensen, California Air Resources Board  
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