

November 14, 2022

California Air Resources Board (CARB)  
Clean Transportation Incentives Division  
1001 I Street  
Sacramento, CA 95814

Re: SEIU 2015 Comments on the Fiscal Year 2022-2023 Funding Plan  
for Clean Transportation Incentives Draft Proposal

Thank you for the opportunity to comment on the funding plan. We have been engaged as a partner in the Access Clean California program since its initiation several years ago. SEIU Local 2015 represents nearly 420,000 workers in the home care, nursing home, and private agency home care industry in California who provide care and support to our most vulnerable Californians. They depend on reliable transportation for their jobs, but are also struggling to make ends meet. At the same time, they find themselves increasingly in the role of being first responders in climate emergencies brought about by smoke, smog, heat, fires, and extended power outages. Access to clean and affordable transportation, energy, and reliable power would dramatically increase their quality of life and livelihood. This is why we signed on to Access Clean California, in the hopes of getting many of our members behind the wheel of a reliable, affordable, clean vehicle.

We have reached out to thousands of our members with information since the official launch of the benefit finder, and found them eager to learn more and explore their options. Nearly all were eligible for some assistance, but sadly only a few have had the patience and perseverance to navigate what is in our view still an overly complicated, uncertain and lengthy process.

With the Governor and state's commitment to increased funding for climate action and the new incentives coming from the Inflation Reduction Act, we should be celebrating, but instead we find ourselves uncertain whether the programs will be able to deliver on their promise. We believe that competition for available used and new ev's may increase dramatically. Unless the challenges to the equity programs can be resolved our fear is that our members and other low and moderate income Californians will be increasingly left behind driving increasingly costly and unreliable gas powered vehicles. To truly meet the equity goals that have been outlined by the state and federal administrations, the programs must scale up to meet the demand sustainably and efficiently.

With respect, we submit the following concerns and recommendations for consideration in the funding plan.

#### **Income/Eligibility Verification**

We applaud the work that the Access Clean California community care team is doing to streamline income verification. Many if not most individuals most in need for these equity programs are already eligible and have been verified to receive benefits under another state program administered by county social service offices. Is there any reason that county offices could not make individuals aware of programs or provide some kind of certification of eligibility to streamline program application? County social service budgets should be increased commensurate with the increased workload. In an ideal



world, the programs would themselves be integrated with county social program delivery rather than having separate administrators.

### **Funding needs to be adequate and evergreen to meet the need**

In 2021 more than 250,000 EVs were sold in California, 12% of new vehicles. At best the clean mobility programs target assisting in the purchase of 10-12,000 vehicles for low and moderate income customers, which seems far below that required to ensure that low and moderate income families aren't left behind. The state should determine how many vehicles need to be made available through incentive programs to meet the need anticipated over the next 15 years.

- Funding should be evergreen rather than subject to yearly allocations. We suggest that the state set a 2035 goal based on the projected need and that this be funded through this period. The CVRP doesn't have a cap on funds, neither should the equity programs.
- We are quite disappointed with the lengthy closure of the CVAP and see no need to re-issue an RFP simply because eligibility guidelines are being changed.
- Grant amounts need to be further increased to account for the mark ups charged for new and used evs as demand increases faster than supply, or find a way to fix prices by participating dealers.
  - Could the state consider an annual purchasing agreement for a set number of affordable ev's of different types and then set the price for those who are eligible?
  - Could the state create a low interest revolving loan fund through one of its investment boards or pension funds?

### **Application processing times and notifications**

Replacing an unreliable or a polluting vehicle that can't pass smog certification with an ev is a timely event. Those who must have a car to do their jobs, can't wait 8-10 months or longer to obtain a car only to then endure twelve to eighteen months on a delivery waiting list. The frequent closing and uncertain re-opening of programs also contributes to delay and uncertainty, and undermines confidence in the program.

### **Tax Issues associated with some program incentives.**

Some programs have decided to treat program awards as taxable income. Taxing these benefits creates a significant risk of being bumped into a different tax bracket or losing eligibility for other programs that provide them vital services. It is our understanding that attorneys for CARB have opined that this is not in fact taxable income—individual Air Boards which are creatures of the state should not have discretion to decide differently. The Attorney General's office should be asked to weigh in on this matter and settle it once and for all.

### **Continue and expand outreach.**

CARB should be applauded for its outreach efforts to date. Existing programs should be continued. However, it's already clear that demand outpaces funding, expanded outreach must match funding adequacy. Further we would encourage CARB to fund outreach efforts aimed at other state and local benefit programs and institutions that serve eligible populations such as Title 1 schools, county hospitals, and workforce training programs serving disadvantaged communities.

### **Program Streamlining and simplification**

The Access Clean California has greatly simplified the search for possible program fits that may apply to a given individual. However there is still considerable fragmentation and differing application criteria between programs. All clean cars for all programs should operate with one set of eligibility guidelines, policies and procedures across all regions.

SEIU Local 2015 members are largely low-income people of color, many of whom are living paycheck to paycheck. They are wholly dedicated to providing personal, critical care that keeps our state's most vulnerable residents safe and allows them to receive the long-term services they need either at home or in a skilled nursing facility. Local 2015 members are also committed to lifting up the union's priority of advancing environmental justice advancements.

Having access to clean, affordable vehicles is of utmost importance for all sectors of the long-term care workforce; home care workers are responsible not only for commuting to and from their consumer's homes, but frequently are tasked with driving their consumers to medical appointments and to run daily errands. Nursing home workers similarly require transportation to their workplaces, and many of these caregivers hold jobs at multiple facilities, making it even more pressing that they are easily able to commute between their homes and the different worksites. Working overnight and night shifts is also a common practice in the nursing home industry that raises a number of safety issues for those workers who do not have access to personal transportation. A reliable, affordable vehicle is key to long-term care workers' ability to be successful in their work, so programs such as the Acces Clean California are essential to supporting the vital role they play in caring for seniors and people with disabilities. We hope that the CARB will consider our feedback and suggestions that have been suggested with this essential workforce in mind, and we look forward to the continuation and expansion of this critical program.

A handwritten signature in black ink, appearing to read 'Dereck Smith', with a stylized flourish at the end.

Dereck Smith

Executive Vice President, SEIU Local 2015