

May 20, 2019

Clerk of the Board  
1001 I Street  
Sacramento, California 95814

**RE: San Joaquin Valley Air Pollution Control District  
Comments on Proposed Community Air Protection  
Incentives 2019 Guidelines**

Dear Sir or Madam:

The San Joaquin Valley Air Pollution Control District (District) appreciates the opportunity to comment on the California Air Resources Board (CARB) Proposed Community Air Protection (CAP) Incentives 2019 Guidelines. The District has worked closely with CARB to ensure that the incentive funding appropriated by the California Legislature to support the goals of Assembly Bill (AB) 617 is effective in improving air quality in communities most impacted by air pollution in the San Joaquin Valley. As part of a broad, comprehensive effort to engage with stakeholders within these impacted communities as well as in disadvantaged and low-income communities throughout the Valley, the District has been effective in administering the initial round of CAP Incentive funding provided under AB 134. This is particularly critical in the San Joaquin Valley because the Valley faces substantial socio-economic disadvantages in comparison to other regions of the state. Presently, CalEPA designates that 20 out of the top 30 most disadvantaged communities in California are located in the Valley.

With additional appropriations being made available in the 2018-19 fiscal year, SB 856 provides additional categories for voluntary incentive programs to further support the goals of AB 617. The proposed CAP Incentives 2019 Guidelines provide the framework under which this additional funding will be administered. The following are the District's comments on these proposed guidelines:

1. The District is generally supportive of the flexibility and expanded project categories provided under the proposed guidelines and urges CARB to maintain this flexibility to ensure that the District can remain responsive to the needs of Valley communities. The District supports the continued inclusion of projects eligible for funding under the Carl Moyer and Proposition 1B programs. These programs provide the framework to fund cost-effective voluntary emission reduction projects and assist the District in achieving reductions in the Valley's disadvantaged communities in a manner that will also assist our attainment efforts in our recently-adopted State Implementation Plans.
2. The District is supportive of the focus on zero-emission charging infrastructure projects. Mobile sources are the leading contributors of air pollution in the Valley and to help meet attainment of federal air quality standards, the District has and will continue to focus significant resources towards the advancement and deployment of clean vehicle technologies and infrastructure.

**Samir Sheikh**

Executive Director/Air Pollution Control Officer

**Northern Region**

4800 Enterprise Way  
Modesto, CA 95356-8718

Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**

1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244

Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**

34946 Flyover Court  
Bakersfield, CA 93308-9725

Tel: 661-392-5500 FAX: 661-392-5585

3. The District is supportive of the inclusion of stationary sources as project categories eligible for funding under the CAP Guidelines and encourages CARB to continue to expand the list of eligible stationary source projects. However, in order for the District to remain responsive to the public and communities, these guidelines must provide the necessary flexibility to identify and develop projects, with public input, that are responsive to the needs of the communities in a streamlined manner. The District will continue to work with CARB to develop the framework for enabling the District to develop and administer projects not specifically included in this document. To that end, we encourage CARB to allow the flexibility to specify in a CERP a set of guidelines under which future community-chosen projects may be funded (e.g., a specific stationary source emissions control project that may be identified after the CERP is adopted).
4. These proposed guidelines contain many additional administrative requirements that are well above and beyond standard incentive program requirements, including consideration of exposure and the inclusion of several strategies that have never been implemented through voluntary incentive programs. As currently designed, the amount of administrative funds proposed for District implementation may not be sufficient to comply with these additional administrative requirements. We suggest that the program be significantly more streamlined to reduce unnecessary administrative costs.

Once again, the District appreciates the opportunity to comment on these proposed guidelines and commits to ongoing dialogue and engagement with CARB to ensure that these guidelines and associated funding provide appropriate flexibility to ensure that these funds support the overall goals of AB 617.

Sincerely,

  
for Samir Sheikh  
Executive Director/Air Pollution Control Officer