



November 3, 2023

Chair Randolph, Members of the Board and Staff  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Proposed Fiscal Year 2023-24 Funding Plan for Clean Transportation Incentives**

On behalf of Plug In America, thank you for the opportunity to comment on the proposed Fiscal Year 2023-24 Funding Plan for Clean Transportation Incentives. Plug In America is a nonprofit electric vehicle advocacy group that represents EV drivers across California and the U.S.

We appreciate the time and effort in crafting this proposed plan and the community engagement opportunities offered to provide feedback on the plan. In particular, we support the evening community meetings, which CARB offered in response to receiving feedback that daytime meetings can be difficult for community members to join. We encourage CARB to continue to explore public and community engagement strategies to ensure that all residents in California are aware of available incentives to support electric vehicles.

There continues to be a significant need for consumer education about EVs and the availability of clean vehicle incentives. Plug In America conducts an annual survey of EV drivers across the nation. While not localized to California, the 2023 results showed “EV intenders”<sup>1</sup>, even more so than EV owners, have greater difficulty finding information on EVs in general. Further, almost 40% of EV intenders reported difficulty in finding information on *how to apply for incentives or rebates*.<sup>2</sup> We look forward to continuing to work with CARB to educate consumers on these important incentives.

Plug In America supports staff’s recommendations in the Proposed Funding Plan on the equity and light-duty investments for FY 2023-24. Plug In America understands staff’s proposal to make adjustments to Clean Cars 4 All (CC4A) and Financing Assistance for Lower Income Consumers Project, especially as the Clean Vehicle Rebate Project (CVRP) sunsets. We look forward to the rollout of the new joint project for CC4A and Financing Assistance and to continuing to support the development of programs to increase access to electric vehicles. Plug In America is pleased to see proposed changes to the plan to increase access to a wider range of electric transportation options, including zero-emission motorcycles and electric bikes. Specifically, Plug In America highlights the following changes to CC4A and Financing Assistance:

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<sup>1</sup> “EV intenders” are defined in Plug In America’s 2023 driver survey and results as “those who do not currently own an EV but are considering purchasing one within the next 12 months.”

<sup>2</sup> 2023 EV Driver Survey, Plug In America, <https://pluginamerica.org/survey/2023-ev-driver-survey/>



- **Support for zero-emission motorcycles (ZEMs):** As identified in the proposed plan, zero-emission motorcycles (ZEMs) offer an additional mobility option for Californians. As of 2023, California has nearly [1 million registered motorcycles](#) on its roads, far more than any other state in the Nation. Incentivizing ZEMs expands access to zero-emission vehicles that will continue to reduce emissions and improve air quality in California. Additionally, different households and consumers have different needs, and not all consumers need larger, higher occupancy vehicles. As ZEMs are currently only eligible for an incentive through the CVRP and CVRP is set to close, Plug In America supports staff's proposal to include ZEMs as an eligible vehicle type for CC4A and Financing Assistance. We also support staff's proposal to raise the incentive amount from the \$750 currently offered by CVRP to a maximum of \$4,500 (or \$6,500 for applicants living in disadvantaged communities) through CC4A.
- **Increased support for adaptive equipment:** Additionally, Plug In America appreciates and supports staff's proposal to increase incentives through CC4A and Financing Assistance for adaptive equipment for eligible Californians with physical disabilities to allow funding of up to 50% of the cost of adaptive equipment with a maximum incentive of up to \$5,000 for project participants who are purchasing a replacement vehicle. Given that accessibility conversions of vehicles can cost upwards of [\\$30,000](#), an incentive of \$5,000 seems inadequate. That is why we're encouraged that CARB will provide some flexibility for incentives of more than \$5,000 (via case-by-case review by CARB.) We encourage CARB to follow through on the commitment to continue to evaluate the effectiveness of these incentives and determine if adjustments are necessary.

Thank you again for the opportunity to provide these comments.

Sincerely,

Ingrid Malmgren  
Policy Director, Plug In America