



LA County Chief Sustainability Office
Environment • Economy • Equity



5.22.18

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

Re: Action Alert re VW Environmental Mitigation Plan

Dear California Air Resources Board Members:

On **May 25, 2018**, you will be asked to review (and possibly vote on) the \$423 million California VW Beneficiary Mitigation Plan. We believe that this plan still fails to address several critical elements that will ensure that we are made whole from VW's wrongdoing in their diesel deceit.

1. **Funding should be prioritized in areas of the state that have had the greatest impact from VW's diesel vehicles.** Staff insists that providing funding statewide "will provide the most equitable opportunity" and will ensure "more competitive and cost-effective projects." ***We urge you to rethink and revise the definition of equity within this plan.*** The state normally does a great job at recognizing that a core component of equity is ensuring benefits are felt in the most disadvantaged communities within the state. Another key aspect of equity is addressing where the VW diesel vehicles were distributed and the air basins they traveled through. We would argue that the overly narrow definition of equity as only *geographic equity* should not supersede these other very important equity considerations of VW diesel vehicle locations and disadvantaged communities in distributing funds.
2. **Rethink a strict first come, first served program structure.** This structure does not ensure that the state will achieve "more competitive and cost-effective projects." In fact, it many times does the opposite. ***We would urge you to develop minimum criteria that projects must meet, even within the first come, first serve structure, to ensure that the best projects and those that address real equity considerations as well as achieve the most emissions impact are those that move forward.***

It is so critical that we get this plan right and truly repair the damage that has been done by this terrible act of deception. We will be in person at the hearing on May 25th to echo these same sentiments, and we appreciate your time in reviewing these issues. Please don't hesitate to reach out to me or any member of my team if you would like to discuss these items in more detail and develop a more favorable approach to addressing these deficiencies within the plan.

Sincerely,

Lauren Faber
Chief Sustainability Officer
City of Los Angeles

Gary Gero
Chief Sustainability Officer
County of Los Angeles

Ellah Ronen
Program Officer, LA n Sync
California Community Foundation