



BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

October 31, 2024

Dr. Steven Cliff
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Proposed Fiscal Year 2024-25 Funding Plan for Clean Transportation Incentives

Dear Dr. Cliff,

Thank you for the opportunity to provide comments on the Proposed Fiscal Year 2024-25 Funding Plan for Clean Transportation Incentives and in particular the proposed Clean Cars for All (CCFA) Program allocation distribution. The proposed CCFA distribution plays a critical role in the allocation of future CCFA program funds. We appreciate CARB staff's efforts in developing this distribution plan and for working with us on the initial concerns we expressed earlier to staff and at the September 10th public workshop.

The Bay Area Air Quality Management District (Air District) has implemented the CCFA Program in the Bay Area since 2019. This program helps us improve air quality to protect public health, reduce historical and current environmental inequities, and mitigate climate change and its impacts, with our core values: Environmental Justice, Equity, Integrity, Partnership, Transparency, and Trust. Through CCFA we have worked with our lower-income residents and local partners to replace more than 5,200 vehicles with cleaner options. CCFA plays a critical role in making clean vehicles a more affordable option for lower-income residents and is critical to meeting state and our local goals for zero-emission vehicle adoption and air quality and Greenhouse Gas (GHG) reductions.

We agree with the proposed CCFA Bay Area allocation (19%) in the proposed Fiscal Year 2024-25 Funding Plan. We recognize the challenge in distributing funds in a way that captures core program objectives and predicts future demands. A fixed distribution provides some certainty in the allocation of future funds, but there should also be an added layer of review for fairness and reasonableness, with some flexibility to consider other factors prior to finalizing future CCFA distributions. While the lower proposed Driving Clean Assistance Program (DCAP) allocation percentage seems reasonable as of now, when new funds do become available, the success of this program should be reassessed to confirm the funding need. Future funds that may not be needed for DCAP should then be reallocated to other successful CCFA programs where they could be most beneficial.

We appreciate the opportunity to provide this input and value our partnership with CARB and are committed to continuing to offer this program to our residents.

Sincerely,

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

Philip M. Fine, Ph.D.
Executive Officer/ APCO

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