



August 27, 2024

California Air Resources Board
1001 I Street
Sacramento, California 95814
Via electronic submittal

Re: Comments on Proposed 15-day Changes, Proposed Amendments to the Low Carbon Fuel Standard (LCFS) Regulation

Dear Chair Randolph and Board Members:

The undersigned organizations are pleased to submit comments specifically on the use of credits generated by electricity used as a transportation fuel. We believe that credits representing non-metered residential electric vehicle (EV) charging should be used to benefit our disadvantaged and low-income communities that have suffered the greatest impacts of transportation pollution. These communities also face the greatest barriers to adopting clean transportation. The 15-day changes would not serve those communities as well as the previous proposal, so we recommend the following:

1. The majority of the statewide program's funding should be directed toward speeding the transition to zero-emission transportation in the medium and heavy-duty sectors. Pollution and adverse health effects from heavy-duty transportation are primarily and disproportionately borne by low-income communities and communities of color. The transition to zero-emissions (ZE) transportation in those sectors is essential to meeting our air quality and climate standards; this transition is well behind the pace of the light-duty sector, so prioritizing medium and heavy-duty is appropriate.
2. Any light-duty EV incentives funded by LCFS credits, whether administered by Electricity Distribution Utilities (EDUs) or Original Equipment Manufacturers (OEMs), should be targeted only to low and moderate-income Californians. Achieving air quality and climate standards requires a focus on equity, so that all our residents benefit from access to clean transportation. Credits should go to assuring that successful existing programs like Clean Cars 4 All are fully funded, as well as supporting innovative new approaches.

3. CARB should retain and enhance the existing category of "Multilingual marketing, education and outreach" within the list of pre-approved projects eligible for funding by holdback credits. Equity-focused community groups and stakeholders participating in CARB work groups are consistently asking for greater investment in this area, and specifically for investments that directly fund local community-based organizations (CBOs) who are trusted in priority communities and are best able to support Californians facing the highest barriers to transitioning to EVs. This would also align with how the proposed 15 day changes explicitly add "marketing and outreach programs" as an approved use of base credit proceeds by the OEMs, and create critical opportunities for coordination and collaboration. We recommend that this category be retained in the revised regulations and amended to explicitly pre-approve investments in outreach through CBOs.

Thank you for your consideration.

Sincerely,

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Coalition for Clean Air

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