

Marlene Grossman

04-11-7
06-11-6

December 6, 2006

To: Clerk of the Board, California Air Resources Board
From: Marlene Grossman, Executive Director

Re: Comments on CARB proposed guidelines for the Light Duty Carl Moyer Program.

Pacoima Beautiful, a community based organization in Pacoima, California, has spent considerable time educating Pacoima residents on the link between health and auto emissions. Our goal, through funding provided by the William and Flora Hewlett Foundation, was to help enroll at least 200 vehicles in the State Smog Check Program in order to reduce health impacts of "super-emitters" on the community. To that end, the Bureau of Automotive Repair staff helped provide support to Pacoima Beautiful staff on assisting residents in the application process. To date, Pacoima Beautiful has distributed more than 6000 flyers through many venues in the community and met with more than 2300 residents individually and in groups. Out of the 2300 residents, approximately 300 residents met some of the eligibility requirements for application to either repair or retire their vehicles. Of the 300, 216 came to the Pacoima Beautiful offices seeking assistance in filling out applications. Of those, 188 did not meet the eligibility requirements. Most were rejected because of either the 120 day filing policy, lack of documentation on change of ownership or the owner not knowing about the need to register the vehicle. Twenty-eight residents met all the eligibility requirements. Eight of those were accepted into the program and eighteen were rejected for various reasons. We are waiting to hear about the two remaining,

We feel that it is important for us to share with you what we have learned to date about helping residents in low income communities such as Pacoima to participate in the state wide Smog Check program and similar programs:

- One-on-one outreach and education is effective in providing accurate information on the need for compliance with the Smog Check program. One-on-one outreach is time consuming, however, it is the most effective way for many residents living in communities such as Pacoima, who tend to fear government and who may be undocumented, to understand the significance of their individual participation in reducing the impact of emissions on the health of their family and how it benefits the community as a whole.
- While the majority of residents in Pacoima do not know the impact of having an improperly functioning car on their health or on their children's health, once they do know, they are willing to do something about it if financial and policy barriers are not an issue.
- The process of applying for funds through the State's Consumer Assistance Program (CAP) as part of the Smog Check Program while quite simple in theory is in fact arduous for many of the residents we met with. It was necessary for a staff member from Pacoima Beautiful to walk the residents through each step of

the process of qualifying and applying. They could not do it on their own. For example, they did not know where to find their Vehicle Identification Number.

- Even when residents appeared to qualify to apply for the CAP program, many were turned down because they did not in fact meet legislated criteria: (1) own their car for at least two years, (2) have proper registration, or (3) not tampered with the smog device. Several residents we spoke with purchased their vehicles in non traditional ways: through relatives, auctions or on the street. These residents in fact owned their vehicles but did not have proof. The vast majority did not own their vehicles for two years.
- According to bureau of automotive repair records of the 87,000 vehicles registered in the Pacoima 91331 zip code, 20,000 of these are delinquent, meaning they have passed their smog check in a timely manner but do not have current tags. These vehicles, as delinquent vehicles, may not be part of the EMFAC model and therefore being unaccounted in the ARB's mobile source inventory. Therefore the emissions inventory, for modeling purposes, may be significantly underestimated in low income areas.

Our conclusion is that either the existing program needs to be changed or a new program implemented to assist low income residents in communities such as Pacoima. If the goal is to remove 3,000,000 super emitter/older cars from the streets of California and for the program to be cost effective then there needs to be flexibility in how this gets done.

Our recommendations are as follows:

- The two year ownership requirement needs to be waived when appropriate. If people can show that they in fact own the vehicle they are driving and have done so for some acceptable period of time then they should be able to qualify. So that people don't take advantage of the program, there can be time limits on when they can apply for each vehicle in their possession.
- Registration requirements are not complicated but some people fear going to the DMV. The DMV therefore should go out into the community. Pacoima Beautiful had recommended that our annual Family Day (at which more than 1000 residents participate in an education and resource fair) be used as a venue for the DMV to help get those vehicles registered. Other such venues can be utilized.
- The 120 day window for getting a smog check should be lifted. If residents come in to get their smog check, they should be allowed to do so because in many cases the issue is financial and not time. Many people we spoke with did not get their smog checks done in a timely manner because they did not have the money to pay for the smog check or smog check repairs. They did not know about the CAP program.
- The current amount allowed for retiring a vehicle is a maximum of \$1,000. Those residents who qualified for the program and went to a certified dismantler received \$1,000. Those who were rejected by the program and went to a dismantler sanctioned by the state, always got much less. In speaking with auto dealers in the San Fernando Valley the replacement cost of a vehicle is at least \$2500. There is a need for vouchers to assist low income residents to supplement

the difference between what they get to retire their vehicle and the actual cost to replace it.

- Vehicles that are not operational should be permitted into the program. Some residents have cars on blocks or stored somewhere on their property. The owners do not want to retire their vehicles because they won't get much money for them. While they are not posing a hazard on the road they are causing blight in the community and hazards to the environment.
- Lastly, although the number of applicants that Pacoima Beautiful helped was admittedly small, the outreach was very successful for the 2300 residents who we met with face to face. However, 2300 people in a community of more than 50,000 drivers is a very small percentage. Outreach needs to be done on a much larger scale. BAR, at the beginning of the year, sent out postcards to those whose smog check was due and suggesting that the owners of the vehicles contact Pacoima Beautiful for assistance in participating the program. However, after a short period of time it became obvious that many of the recipients of the postcards were not the owners of the vehicles and BAR concluded that sending the

Sincerely,



Marlene Grossman
Executive Director