



July 16, 2018

Chair Mary Nichols and Board Members
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Dear Chair Nichols and the members of the California Air Resources Board,

On behalf of the Coalition for Clean Air (CCA), thank you for the opportunity to comment on the California Air Resources Board's (CARB) proposed guidelines for the Clean Cars 4 All (CC4A) and Enhanced Fleet Modernization (EFMP) Programs. We are pleased to support these guidelines and have recommendations on how to further strengthen them.

Modernizing California's light-duty passenger vehicle fleet is a key component of California's greenhouse emissions reduction and equity goals. According to CARB, vehicles over 20 years old account for only for only 5% of all miles traveled yet are responsible for 44% of daily smog-forming emissions from motor vehicles. Additionally, the United States Federal Reserve found households are more likely to buy a new vehicle if they are white, married, have more education and have a higher income. This strongly suggests older, more polluting vehicles are concentrated within low-income communities and communities of color. These communities are also disproportionately burdened by poor air quality and pollution. It's imperative for California to remove the barriers to electric vehicle adoption and mobility options for all Californians.

CCA has participated in many of the CARB workshops, community forums, teleconferences and stakeholder meetings related to the proposed guidelines. We believe the guidelines reflect the legislative intent of AB 630 and broader goal of climate equity. These guidelines also tighten up ambiguous language, making sure dirty vehicles are replaced with clean vehicles, and further limit the potential for parts to find their way back to the streets. We also appreciate that some of our concerns and ideas were addressed in the proposed guidelines. With that said, CCA would like to present some additional comments:

- 1. Outreach for the CC4A and EFMP Programs should include multiple strategies.** While CARB's current practice and the proposed guidelines leaves outreach strategies to the discretion of the implementing air districts, CARB should strongly encourage the districts to use multiple strategies in reaching out to the community. These strategies can range from large, hosted events such as ride-and-drives and on-the-spot smog checks, online application tools, as well as traditional and social media. Given the target demographic of the program, relying on one outreach strategy may result in limited reach. For example, a purely online outreach strategy will likely miss those without access to the Internet. Additionally, many local community leaders and elected officials have expressed interest in co-hosting events with their local air district to promote CC4A and EFMP. Partnerships with trusted local and community leaders will increase the effectiveness of CC4A and EFMP outreach efforts.

- 2. Increasing the incentive amount for mobility options for all income levels will greatly improve CC4A and EFMP.** CCA strongly supports the staff's recommendation to increase the mobility options incentive amount from \$4,500 to \$7,000. While replacing dirty cars with clean cars should be a goal, promoting options like public transportation and carsharing will help get cars off the road entirely. Reducing road traffic will lead to broader benefits such as less traffic congestion and idling, yielding improved air quality as a result. However, this option may present a drastic change for many consumers and may not be as readily adopted. As such, making the value of mobility options equal to that of a vehicle will increase the attractiveness of the option. Additionally, mobility options must be presented as a viable alternative to cars to overcome consumer hesitancy. Finally, CCA hopes future legislation or regulation will allow CARB to include bicycling as an eligible mobility option.

- 3. Connecting consumers with other incentives will increase the effectiveness of all programs.** Ensuring consumers are aware of and able to "test drive" other incentive programs will help improve the effectiveness of all programs. In addition to having older, more polluting vehicles, low income residents and residents of disadvantaged communities often have other needs, such as weatherization, energy efficiency and charging infrastructure. Connecting residents with these programs will help yield additional greenhouse gas reduction and air quality benefits.

Thank you for your consideration of these comments. CCA remains committed to the successful, ongoing implementation of CC4A and EFMP, and will continue to engage with CARB, the air districts and local elected and civic leaders regarding these important programs. We look forward to working in partnership with CARB, local air districts, and the communities that stand to benefit from these programs.

Sincerely,



Bill Magavern
Policy Director



Chris Chavez
Deputy Policy Director