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10-TRAN-01 SB 114 Funding Available for Zero Emission School Buses and Infrastructure

Additional submitted attachment is included below.



April 17, 2024

California Air Resources Board
1001 I Street
Sacramento, CA 95815

Re. Proposed Plan for SB 114 Funding for Zero-Emission School Buses & Infrastructure

Dear California Air Resources Board Members and Staff,

Thank you for the opportunity to provide comments and recommendations on the proposed plan for SB 114 Funding Available for Zero-Emission School Buses and Infrastructure. The Los Angeles Cleantech Incubator (LACI) greatly appreciates the California Air Resources Board's (CARB) leadership in supporting and accelerating the transition to zero emission school buses.

This vision is shared by LACI in our effort to build an inclusive clean energy economy that reduces air pollution, improves public health, protects vulnerable populations, and creates jobs and economic growth. To advance this mission, LACI convenes the [Transportation Electrification Partnership](#) (TEP), an unprecedented regional public-private collaboration (in which CARB plays a critical leadership role) to achieve deep reductions in climate and air pollution by the time of the 2028 Olympic and Paralympic Games by pursuing bold targets, pilots, initiatives and policies that are equity-driven, create quality jobs, and grow the economy. Together, LACI and TEP have set [ambitious zero emissions \(ZE\) electrification goals](#) for Los Angeles County to achieve by 2028; one of which focuses on school buses. Specifically, **TEP has set a goal for Los Angeles County to reach 45% of school buses in-use and 100% of new school bus sales to be zero emission by 2028.**

To reach this goal and ensure that funding for the transition to zero emission school buses is most effective for all local education agencies (LEAs), LACI has recommendations on how to alter the implementation of SB 114 funding.

Specifically, SB 114 does not enable local educational agencies that don't own their buses to participate in the HVIP Prop 98 incentive program. **Over thirty percent of existing school buses in the state are owned by a transportation contractor or bus electrification-as-a-service provider and are therefore not eligible to be replaced by zero-emission school buses utilizing the SB 114 funding.**¹

Through AB 579, the state has mandated that all LEAs purchase 100% zero emission school buses by 2035. Not enabling all districts to participate in this incentive program puts an unnecessary burden on

¹ LAO, *The 2022-2023 Budget: Green School Bus Grants*. <https://lao.ca.gov/reports/2022/4525/green-school-bus-021022.pdf>.

certain LEAs over others, specifically urban school districts that are socio-economically disadvantaged and overly burdened by poor air quality created by the transportation sector.²

Therefore, we are asking you to enable more LEAs to participate in this program to protect the health of our most vulnerable community members – our children—and help all districts with this transition to a cleaner future.

As written, the Prop 98 HVIP program excludes districts that utilize transportation models where the district does not own the vehicles, even though this model is in the best interest of the schools' operations and can be a critical tool to ensuring the LEA can realize the air quality benefits of zero-emission technology.

California should model the Prop 98 HVIP program after other national programs, including the Environmental Protection Agency's Clean School Bus Program, which does enable service models to participate in grant and rebate programs on behalf of public-school districts. This structure has led to more rapid deployments of electric buses where needed most.

We appreciate the opportunity to submit this letter and look forward to moving towards a zero-emission future on behalf of our communities.

Best Regards,

Michelle Kinman
SVP, Market Transformation
Los Angeles Cleantech Incubator

² People living in Los Angeles County are exposed to 60 percent more vehicle pollution than the state average. Chronic exposure to PM2.5 in children has been linked to slowed lung-function growth, development of asthma, and other negative health impacts (Source: Union of Concerned Scientists, "Inequitable Exposure to Air Pollution from Vehicles in California").