

# Planning and Capacity Building, Clean Mobility in Schools, and the Sustainable Transportation Equity Project

Fiscal Year 2022-23

## PUBLIC COMMENT SUMMARY

This document includes a summary of the comments received during the public comment period for the Planning and Capacity Building (Planning), Clean Mobility in Schools (CMIS), and Sustainable Transportation Equity Project (STEP) Fiscal Year (FY) 2022-23 Draft Requirements and Criteria along with the associated actions/responses from the California Air Resources Board (CARB) addressed in the final [FY 2022-23 Request for Applications](#) (RFA). Thank you to all who provided comments.

**Note:**

If you require this document in an alternate format or language, please contact Heather Choi at (279) 208-7556 or [heather.choi@arb.ca.gov](mailto:heather.choi@arb.ca.gov). TTY/TDD/Speech to Speech users may dial 711 for California Relay Service.

July 24, 2023

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## Overview

**Public comment period:** February 28 – March 31, 2023

**Public comment topic:** [Draft Requirements and Criteria for Planning, CMIS, and STEP](#)

**Public commenters:** 17

- Bay Area Air Quality Management District
- GRID Alternatives
- Hop Skip Drive
- Institute for Local Government
- Miocar
- Regional Climate Project Working Group (counties of Monterey, San Benito, and Santa Cruz & cities of Santa Cruz and Watsonville)
- San Diego Unified School District
- Tamika L. Butler Consulting
- The Greenlining Institute
- The Mobility House
- University of California, Berkeley's Othering and Belonging Institute and Leaders-in-Residence
- University of California, Davis's Center for Regional Change
- University of California, Los Angeles
- University of California, San Diego's School of Global Policy & Strategy
- Via Transportation, Inc.
- Waterford Unified School District
- One private citizen

### Comments and actions/responses:

The comments received by CARB staff have been modified for clarity and concision and aggregated in the chart below. If you do not see your submitted comments reflected in this aggregation, please contact CARB staff at [step@arb.ca.gov](mailto:step@arb.ca.gov).

### Most Common Comments

Topic	Public Comment Received	STEP Action/Response
Community-based Organizations	<ul style="list-style-type: none"> <li>• Require at least two community-based organizations (CBOs) as sub-applicants.</li> <li>• Prioritize tribal governments as leads and applicants with multiple CBOs—not CBOs as leads.</li> </ul>	CARB modified scoring to prioritize and incentivize tribal governments as leads and applications with at least two CBOs.
Concept Phase	Concept phase asks for an appropriate amount of information.	Thank you.
Eligible Costs	Include food, beverage, and childcare as eligible expenses for outreach and engagement activities.	CARB understands these are important parts of equitable outreach and engagement and encourages resource contributions to be used for these costs, particularly while CARB does not have the legal authority to cover these costs.
Financial Sustainability	<ul style="list-style-type: none"> <li>• Projects will need additional public funding in the future; it is not reasonable to expect them to rely on revenue from low-income users.</li> <li>• CARB and technical assistance (TA) providers should actively help projects find other sources of public funding and work with awardees early to plan for other sources of funding.</li> </ul>	CARB understands and will work on building out support for long-term financial sustainability.
Scoring Criteria	<ul style="list-style-type: none"> <li>• Requirements and scoring criteria for Planning grants vs. CMIS/STEP grants should be different. Planning grants shouldn't need to have to answer a question about community needs.</li> <li>• Provide more detail on how specific point values will be awarded.</li> </ul>	CARB worked on differentiating requirements and scoring criteria between Planning grants vs. CMIS/STEP grants and provided more detail on how points will be allocated in the scoring criteria.

Topic	Public Comment Received	STEP Action/Response
Partnership Agreements	<ul style="list-style-type: none"> <li>• Partner memorandum of understanding (MOU) should be set up when applicants apply – not after award or execution.</li> <li>• Six months is too much time to set up a partner MOU.</li> <li>• Allow one year for partner MOUs for Planning grants.</li> </ul>	<p>CARB requires a partnership agreement within six months of grant execution but encourages early development if possible. CARB recognizes the need for clarity of and commitment to roles early on in project implementation but also the need for time and resources to develop the governing process and new partnerships. Based on past experience, six months is an appropriate amount of time for this to occur.</p>
Technical Assistance	<ul style="list-style-type: none"> <li>• TA provider should provide guidance on long-term sustainability.</li> <li>• Specific suggestions for additional guidance, including but not limited to samples of funded applications, budget guidance, guidance on long-term sustainability, samples of partnership structures / agreements, and equity / EJ resources.</li> </ul>	<p>CARB developed some of the suggested additional guidance and will work with the selected technical assistance provider to fill in other gaps identified.</p>
Transportation Equity	<ul style="list-style-type: none"> <li>• Include race as a major axis of inequities.</li> <li>• Require activities that support institutional change to give disadvantaged communities more decision-making power.</li> </ul>	<p>CARB worked on adding these suggestions into the definition of transportation equity and reflecting these sentiments more broadly at the beginning of the RFA to the extent that is allowed under State law. While CARB does not require specific activities, the RFA does prioritize and encourage projects that give the residents and representatives of disadvantaged and low-income communities decision-making power.</p>

## Comments on Applicants

Topic	Public Comment	STEP Action/Response
Definitions	<ul style="list-style-type: none"> <li>• Clarify if transit agencies and joint powers authorities are part of local government definition or separate.</li> <li>• CBO definition should require that a majority of staff and board members live in the Project Community.</li> </ul>	<ul style="list-style-type: none"> <li>• CARB clarified that transit agencies and joint powers authorities are part of the local government definition.</li> <li>• CARB aligned the CBO definition with that of the Clean Mobility Options (CMO) program.</li> </ul>
Lead Applicants	<ul style="list-style-type: none"> <li>• Allow university research centers to be Lead Applicants.</li> <li>• Allow transit agencies to be Lead Applicants.</li> <li>• If local governments are Lead Applicants, they should be held to a high standard for contracting with partners and for equity.</li> </ul>	<ul style="list-style-type: none"> <li>• CARB clarified that transit agencies are eligible Lead Applicants and university research centers are eligible as Sub-applicants.</li> <li>• CARB will work on ways to continue supporting equitable power structures during project implementation, particularly when local governments are leads.</li> </ul>
Partnership Structures	<ul style="list-style-type: none"> <li>• How will CARB ensure that partnership agreements take place when they are required to?</li> <li>• Need third-party facilitator for CBO and government.</li> </ul>	<ul style="list-style-type: none"> <li>• CARB outlined more specific expectations for partnership agreements in the RFA and plans to hold Grantees accountable for these agreements as part of the project deliverables.</li> <li>• CARB plans to provide implementation support through the Statewide Planning and Capacity Building Administrator. The administrator will be able to help facilitate communication between CBOs and government.</li> </ul>

Topic	Public Comment	STEP Action/Response
Sub-applicants	<ul style="list-style-type: none"> <li>• Each project team should include a sub-applicant who demonstrates competency in EV fleet / infrastructure planning.</li> <li>• Subcontractors should be awarded funds for their labor to write the grant.</li> </ul>	<ul style="list-style-type: none"> <li>• CARB and the TA providers will encourage appropriate partnerships based on the proposed project types.</li> <li>• CARB cannot pay for activities that occur outside of the grant term, CARB will consider other ways to support this objective through Planning projects and technical assistance.</li> </ul>

### Comments on Projects/Costs

Topic	Public Comment	STEP Action/Response
Eligible Projects	<ul style="list-style-type: none"> <li>• Where do bike safety courses fall?</li> <li>• How are ride-hailing services defined?</li> <li>• Can ridesharing services that don't use ZEVs be funded?</li> <li>• Require clean transportation, land use, and transportation equity plans for all applicants.</li> <li>• Clarify and specify that software for routing optimization and analytics is eligible.</li> <li>• Clarify what "meet CARB's goals for Low Carb Transportation Incentives" means.</li> <li>• Clarify what "changes to the fleet after grant execution are subject to prior approval by CARB" means.</li> </ul>	<ul style="list-style-type: none"> <li>• Bike safety courses are a part of outreach and education.</li> <li>• Ride-hailing services are defined as on-demand ride services where rides are arranged online or over the phone to connect passengers with drivers using their personal vehicles.</li> <li>• The purchase of vehicles that are not zero-emission is not an eligible cost in this RFA. Services that are not zero-emission are eligible as long as the services meet other program requirements, including reducing greenhouse gas (GHG) emissions and vehicle miles traveled (VMT).</li> <li>• CARB does not require that all applicants have clean transportation, land use, and transportation equity plans but does provide funding for these plans and does require that all proposed projects be identified through meaningful community engagement and be consistent with regional plans.</li> <li>• CARB clarified software eligibility.</li> <li>• CARB removed terminology that was deemed to be no longer relevant to the RFA.</li> </ul>

Topic	Public Comment	STEP Action/Response
Eligible Costs	<ul style="list-style-type: none"> <li>• Clarify what it means to “appropriately incentivize community residents.”</li> <li>• Allow funds to cover “ongoing operational costs beyond the grant term” such as software subscriptions.</li> <li>• Explore ways to accelerate the available supply of zero-emission and wheelchair accessible shuttles and minivans or allow for hybrid electric vehicles.</li> </ul>	<ul style="list-style-type: none"> <li>• The Application Guidance provides more recommendations on incentives for community residents.</li> <li>• CARB funds must be spent within the grant term.</li> <li>• CARB will continue to support an increase in the supply of zero-emission medium-duty vehicles through incentives and regulations.</li> </ul>
Resource Contribution	<ul style="list-style-type: none"> <li>• Are there any restrictions on what local and state funds are eligible for match?</li> </ul>	CARB clarified resource contribution requirements.

### Comments on Other Requirements

Topic	Public Comment	STEP Action/Response
Benefits Quantification	<ul style="list-style-type: none"> <li>• Explicitly state whether GHG quantification will be required for full application.</li> <li>• What about projects that have small VMT or GHG reductions but large equity benefits?</li> <li>• Conduct quantitative evaluations to help evaluate how quantified benefits can be realized.</li> </ul>	<ul style="list-style-type: none"> <li>• CARB clarified when GHG quantification is required.</li> <li>• CMIS and STEP grants are expected to have net VMT and GHG reductions, but the size of the reduction is not relevant to project selection. Project selection will focus on the equity benefits of the proposal.</li> <li>• CARB agrees that this type of evaluation is important and has folded this expectation into the data collection requirements.</li> </ul>
Budget	<ul style="list-style-type: none"> <li>• Include smaller maximum funding request and a more specific range for Planning grants.</li> <li>• \$750k seems too low to be split between 15 organizations.</li> <li>• Change the indirect cost limit from 5% to 15% for planning grants.</li> <li>• 5% budget for data collection should also include evaluation activities.</li> </ul>	<ul style="list-style-type: none"> <li>• CARB did not provide a minimum funding amount for Planning grants and maintained the maximum funding amount. This larger range allows for more flexibility and a broader range of project types.</li> <li>• CARB expects to award \$3 million total for between 5 and 16 Planning projects.</li> <li>• CARB increased the indirect cost limit from 5% to 15% for planning grants.</li> <li>• CARB clarified that the 5% budget for data collection includes evaluation activities.</li> </ul>
Community engagement	<ul style="list-style-type: none"> <li>• Ensure residents are a representative part of decision-making body and are engaged from beginning.</li> <li>• Clarify that outreach and engagement should be focused on disadvantaged and low-income communities.</li> </ul>	<p>CARB updated the application itself and the Application Guidance to include these clarifications and expectations.</p>

Topic	Public Comment	STEP Action/Response
Capacity Building	Expand definition and expected outcomes.	CARB expanded the definition of capacity building.
Data Collection and Evaluation	<ul style="list-style-type: none"> <li>• Explain why data collection is important.</li> <li>• Require data on actual vehicle operation days compared to total days available.</li> <li>• There should be more accountability on product satisfaction for EVs.</li> <li>• Why is evaluation only required for some project categories?</li> <li>• Clarify that the evaluation plans must be approved by CARB in advance of data collection.</li> <li>• CARB should provide proactive guidance on development of evaluation plans.</li> </ul>	CARB worked on providing these clarifications and will continue to work with awardees and grantees to identify the metrics and evaluation plans that help measure success toward both CARB and community objectives.
Displacement Avoidance	Change to “displacement prevention.”	CARB made this change.
Financial Sustainability	<ul style="list-style-type: none"> <li>• Don’t expect long-term financial viability to be demonstrated at the time of application.</li> <li>• Planning grants need to include funding for organizational development and working capital.</li> <li>• Have applicants set SMART goals to help plan for long-term.</li> <li>• Have applicants include long-term commitments in letters of commitment and support.</li> <li>• Encourage MOUs and contracts that extend beyond grant term to maintain services.</li> <li>• Include set-asides in future solicitations for past awardees with mobility services that meet certain criteria.</li> </ul>	CARB worked on incorporating these ideas in the RFA (e.g., including long-term commitments in letters of commitment and support and building on ways Planning grants can support long-term sustainability). CARB will continue to explore how these ideas are incorporated into grant implementation and future solicitations.
General	Eligibility requirements are reasonable and feasible.	Thank you.

Topic	Public Comment	STEP Action/Response
Project Community	<ul style="list-style-type: none"> <li>• Clarify whether the low-income or disadvantaged community requirement is for more than 50% of the geographic area or the residents.</li> <li>• Can other communities that may not qualify under CalEnviroScreen apply if that community is also disadvantaged?</li> <li>• Change low-income definition to median income at or below 50% of statewide median.</li> <li>• Clarify if the geographic area of project community can be contiguous or non-contiguous.</li> <li>• Change to "Project Area."</li> </ul>	<ul style="list-style-type: none"> <li>• CARB clarified that the 50% requirement is related to the geographic area and that the geographic area may be contiguous or non-contiguous.</li> <li>• Disadvantaged and low-income communities have been defined by the California Environmental Protection Agency via Senate Bill 535 and by Assembly Bill 1550, respectively.</li> </ul>
Workforce Development	<ul style="list-style-type: none"> <li>• Include direct references to expected workforce standards.</li> <li>• Clarify "high-quality jobs."</li> </ul>	<p>The RFA's Application Guidance defines high-quality jobs and provides other recommendations related to expected workforce standards.</p>

### Comments on Process

Topic	Public Comment	STEP Action/Response
Application Template	Use same Word doc for everyone.	CARB developed application templates that will help standardize applications.
Concept Phase	<ul style="list-style-type: none"> <li>• Make the application process simple and feasible for CBOs to complete.</li> <li>• Ask about barriers for successful project completion and how they may be addressed.</li> <li>• Allow fairly general responses in the concept phase.</li> <li>• 5 pages seems too short for all of the information you’re asking for.</li> <li>• Suggest also asking about potential additional partners that may need more time to formally commit or identify formal role.</li> <li>• Clarify that timeline is tentative.</li> <li>• Clarify application instructions for project description and transportation equity.</li> <li>• Application is too repetitive.</li> </ul>	<ul style="list-style-type: none"> <li>• CARB worked on clarifying applicant instructions, providing more detail on expectations for responses to the questions in the Concept Phase application and how this relates to responses in the Full Phase application.</li> <li>• CARB included a question about barriers in the Planning grant application.</li> </ul>
Coordination with CMO	Why was CMO not included in this solicitation?	The timing for aligning the CMO process with that of Planning, CMIS, and STEP did not work out this round (CMO opened an application window led by their statewide administrator in spring 2023), but CARB will continue to work to align all clean mobility equity programs, including CMO, while advancing the policy objectives of each individual program.

Topic	Public Comment	STEP Action/Response
Example Programs	Heavy-duty Vehicle Incentive Program, Berkeley Climate Equity Fund in 2022, and Transformative Climate Communities were all named as examples of funding programs that were easy to apply to.	Thank you. CARB is learning from these program examples.
Future Coordination	Create a Planning and Capacity Building program page on the California Climate Investments website.	CARB is working on this and will also be developing a Planning and Capacity Building webpage on CARB's website.
General	<ul style="list-style-type: none"> <li>• Draft requirements and criteria were clear and easy to understand.</li> <li>• Clarify early what the highest priority outcomes are for the programs.</li> <li>• Change the way defined terms are identified throughout the document.</li> <li>• Align term usage (letters of commitment and support, awardees, grantees).</li> <li>• Why is an entity placed on a list during one offering and then disappears? If you know who is interested and have applicant's information, why do you have to ask for it over and over again?</li> <li>• Can applicants submit both a CMIS and STEP grant?</li> </ul>	<ul style="list-style-type: none"> <li>• Thank you.</li> <li>• CARB worked on clarifying priorities and application processes and on defining and aligning terms in the RFA.</li> <li>• State programs have different priorities and with those priorities come different processes to identify funding recipients / projects. However, CARB is piloting different methods, such as the joint and phased solicitation approach in the current RFA, to simplify the solicitation process for future applicants interested in multiple State programs and to reduce asking for repetitive information.</li> </ul>
Grant Management	<ul style="list-style-type: none"> <li>• Clarify that grantees will need to be paid on a reimbursement basis.</li> <li>• Define what staff capacity means for grant management.</li> </ul>	CARB provided more clarification regarding when Grantees may be paid in advance and when they must be paid on a reimbursement basis and what sort of capacity is needed for grant management.

Topic	Public Comment	STEP Action/Response
Scoring	<ul style="list-style-type: none"> <li>• Clarify how awardees will be selected and what happens to remaining eligible applications.</li> <li>• Outreach and engagement should be worth more points, particularly for Planning grants.</li> <li>• Increase threshold to 30 points to maximize importance of 2 point application components and avoid excess work for applicants.</li> <li>• Align scoring criteria and application template language.</li> </ul>	<p>CARB provided more clarification on the selection process and aligned language to make it easier to understand how application components are scored. CARB considered the suggested point changes for the concept and full phases.</p>
Technical Assistance (TA)	<ul style="list-style-type: none"> <li>• Will CARB offer advising sessions, particularly to help applicants figure out which grant to apply for?</li> <li>• Has the TA provider already been selected?</li> <li>• Provide additional support to CBOs that are Lead Applicants.</li> <li>• Commit to working with communities to prepare for future solicitations.</li> </ul>	<p>CARB is providing TA through the Institute for Local Government in partnership with People for Mobility Justice and Fehr &amp; Peers, who were selected through a competitive Request for Proposals. CARB will continue to explore these and other ideas to maximize support for applicants and grantees.</p>
Third-Party Administrator	<ul style="list-style-type: none"> <li>• What are the benefits and challenges of a third-party administrator and how will they be prepared to support each project?</li> <li>• Who is choosing the administrator and what are the criteria?</li> </ul>	<p>CARB released a separate solicitation for a third-party administrator that addresses these questions.</p>
Timeline	<ul style="list-style-type: none"> <li>• When will changes be expected to happen on the ground and why does it seem like the final report is the end point?</li> <li>• Include relevant dates and milestones where that milestone is described in the solicitation.</li> </ul>	<p>CARB worked to clarify expected timelines and outcomes and make it easier to track deadlines during the application process.</p>