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May 2, 2023

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California Air Resources Board  
Mobile Source Control Division  
1001 I Street  
Sacramento, CA 95814

Lisa Macumber, Manager  
California Air Resources Board  
Innovative Light-Duty Strategies Section  
1001 I Street  
Sacramento, CA 95814

**Re: Electric Bicycle Incentives Project Design**

Dear Mr. Ransom and Ms. Macumber:

On behalf of the California Bicycle Coalition (CalBike) and our 44,000 members, including an e-bike incentive interest list of almost 17,000, we appreciate the efforts of California Air Resources Board (CARB) staff to design and implement the pilot of the Electric Bicycle Incentives Project (EBIP). As part of the ongoing discussion, we recommend you consider the following suggestions to improve the program.

**Transparency and timing**

We have appreciated the opportunity to participate in the series of work group meetings CARB has hosted to develop parameters for the EBIP, and the robust discussion at the meeting on April 26. It's clear that CARB has listened to input from stakeholders and modified the program accordingly. We strongly support this process and believe it will result in a better launch for this program.

However, we're concerned about the long gap in work group meetings, from January 31, 2023, to April 26, 2023. We're also concerned that there isn't much time between April 26 and the planned soft launch of the program by the end of the second quarter (June 30).

We don't want to see the launch delayed, but we feel public input is still needed on several issues. We encourage CARB to hold at least one additional work group meeting in early May to gather feedback in time to influence the implementation for the launch.

**FY 2022-23 Funding Plan allocation**

The FY 2022-23 Funding Plan proposed an allocation of \$3 million to the EBIP from the Low Carbon Transportation allocation for FY 2022-23. The plan anticipates that this \$3 million allocation is to meet an expected "strong demand" for when the EBIP begins. Furthermore, the

plan states that any additional funds from FY 2022-23 and FY 2023-24 added to the initial \$10 million pilot can be used when the project is eventually launched.

As we have discussed, the \$10 million allocated to the pilot project won't come anywhere near meeting demand. With approximately \$7.5 million available for incentives<sup>1</sup>, that's enough funding for between 3,750 and 7,500 incentives.

CalBike's interest list for the e-bike program has almost 17,000 names. As the launch date keeps getting pushed back and more e-bike incentive programs are developed locally and nationally, interest in California's e-bike incentives grows.

We strongly urge CARB to make the designated \$3 million available to the EBIP in this first round by adding it to the existing grant agreement with the administrator. We further urge CARB to put those funds toward an additional 1,500 to 3,000 incentives.

### **Use of vouchers for accessories**

CalBike applauds CARB's decision to allow participants to use excess money in vouchers for safety gear such as helmets. We strongly encourage you to allow the purchase of bike locks as well, because security and theft are major concerns.

In addition, echoing many comments made in the April 26 work group, we encourage you to add bike baskets and cargo racks as allowed accessories because they add greatly to the utility of e-bikes for running errands and, therefore, replacing car trips.

### **Educational component of the EBIP**

CalBike is in favor of e-bike education, and we believe the online e-bike class created as part of the EBIP will be a valuable resource, including for many people not participating in the EBIP.

However, we are concerned that the proposed education component of this program will include the mandatory completion of an online bicycle safety and environmental climate education course.

We strongly object to making the safety class a requirement to receive an incentive. To add a mandatory 90-minute class to a program aimed entirely at low-income Californians will become burdensome for those facing barriers such as technology, literacy, language, or time. A mandatory safety requirement assumes that participants aren't skilled or educated about operating an e-bike, when the reality is that participants are likely to have a variety of biking experience, from novice to long-time rider.

A safety class requirement will exclude otherwise qualified recipients who don't speak the language(s) the class is offered in. The California Census lists 12 major languages spoken in

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<sup>1</sup> Pedal Ahead FAQs <https://www.pedalaheadsd.org/faq/>

California<sup>2</sup>, and 52.1% of residents speak English “less than very well.”<sup>3</sup> Even if the class is offered in Spanish and Chinese as well as English, people more comfortable in Vietnamese, Farsi, Tagalog, a different Chinese dialect, or one of California’s many other languages would be excluded from participation by this requirement.

We feel the safety class should be a resource participants are informed about and encouraged to use, but it should not be compulsory.

In addition to the online resource, we encourage CARB to offer additional options for e-bike safety education. Many local bicycle coalitions provide excellent in-person safety classes, and we encourage CARB and the program administrator to leverage the efforts of these local groups to create additional training resources and opportunities for EBIP grantees.

### **Application process**

The application process outlined in Slide 20 of CARB’s April 26th work group presentation puts choosing a bike and taking a class before application approval. As noted above, CalBike strongly urges you to make the class optional rather than mandatory. We also urge you not to require bicycle selection before voucher approval.

We believe requiring applicants to select an approved e-bike before they get their voucher could also harm CARB’s equity goals for this program and lead to negative experiences among applicants.

If bike model selection is placed before acceptance, those with the time and resources to find potential e-bikes, take test rides, and make a selection will be favored to receive vouchers. Applicants with little time around work, childcare, or other responsibilities will be at a disadvantage. And bike selection doesn’t guarantee a successful purchase, particularly if the applicant needs to gather additional funds beyond the grant to afford the bike.

Pre-approval bike selection is also likely to increase dissatisfaction in a program that is far too small to meet demand and one in which, as comments at the work group showed, some potential grant recipients are impatient to get a voucher and are under the impression they have already applied. Many qualified applicants will be disappointed because there won’t be enough funds to meet demand in this pilot. We believe that requiring the pre-selection of bikes to receive a voucher will further upset participants who miss the funding cutoff and are already likely to be angry about not getting incentives.

### **Income limitations**

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<sup>2</sup> Language and Communication Access Plan, CA Census 2020.  
<https://census.ca.gov/wp-content/uploads/sites/4/2019/06/LACAP.pdf>

<sup>3</sup> Migration Policy Institute State Immigration Data Profiles, California.  
<https://www.migrationpolicy.org/data/state-profiles/state/language/CA>

To more equitably distribute the funding, CARB has discussed a hybrid approach to providing incentives that would give higher priority for funding to participants with the highest needs. CalBike supports an equity-focused approach to distributing EBIP incentives, particularly for the launch, which has such limited funding.

However, we are concerned about the process outlined in the current FAQs, which states that \$5 million will be set aside solely for high-priority participants, including those with incomes below 225% FPL. Only \$2.5 million would be available to anyone with income under 300% FPL.

This process has not been presented at a work group meeting. We feel it is a significant change from allocation process ideas presented at previous work groups that will severely limit the availability of incentives to many people who have been looking forward to applying for them.

We would like to see more public discussion of this aspect of the program. We recommend a needs-based process, one that aligns with CARB's recent efforts in its Clean Cars 4 All program. While we know that the pilot will be oversubscribed and there will be many disappointed people no matter what the parameters, the proposal outlined in the FAQs is much more restrictive than any of the electric car incentive programs run by CARB, and we're concerned it may affect the success and effectiveness of this pilot and, thus, our ability to secure funding for future years to continue the EBIP.

### **Purchase window and waiting list**

The official FAQs mention a "30-day window" to purchase an e-bike with an incentive from this program. They further state that a waiting list "will only be created if there is a short amount of time between when funding is exhausted and new funding becomes available." We believe both policies should be adjusted.

A window of 30 days to find a bike to purchase is too short, especially for disadvantaged Californians. An e-bike is a major purchase. EBIP voucher recipients should be given more time to visit participating retailers, test-ride bikes, and gather additional funds needed to complete a purchase. We understand the need to have a cutoff for using the voucher, but we believe a more realistic purchase window would be 90 days.

We further recommend the creation of a waitlist for eligible applicants who applied after all funding was spoken for. Based on our discussions with an administrator for a program similar to the EBIP, administered by Peninsula Clean Energy<sup>4</sup>, only around half of the incentives were used in each of the first two cycles.

Given the limited timeframe to make a purchase and the focus of the EBIP on very low-income Californians, we think it is likely that some people awarded incentives won't be able to use them.

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<sup>4</sup> McCamy, L. Local E-Bike Incentives Provide More Options for Californians. *Calbike*. January, 2023. <https://www.calbike.org/local-e-bike-incentives-for-california/>

Therefore, a waiting list is essential so that unused incentives can be granted to others who qualify for the program and the funding can be used to further the goal of replacing VMT.

Our goal is the same as yours: to ensure the EBIP will enjoy solid success, expending 100% of its budget quickly and securing additional funding for future years. We appreciate all of your hard work thus far in making this happen.

We look forward to continuing to work with CARB to support the launch of the EBIP. If you would like to talk more in depth about the above recommendations please feel free to contact me at [jared@calbike.org](mailto:jared@calbike.org) or (714) 262-0921. Thank you.

Sincerely,



Jared Sanchez, Policy Director  
California Bicycle Coalition

Cc:

Dr. Steven Cliff, CARB, Executive Officer  
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Peter Christensen, CARB