

**Comment 1 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

## Comment 2 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.

First Name: Suzanne

Last Name: Bottlik

Email Address: sbotrik@lausd.net

Affiliation: Carson High School

Subject: Electrify America in City of Carson

Comment:

Suzanne Bottlik  
Environmental Science, Engineering, and Technology Academy  
Carson High Teacher  
22328 S. Main Street  
Carson, California 90745

Ms. Mary D. Nichols  
Chairperson, California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95814

RE: VW Settlement and Disadvantaged Communities

Dear Ms. Nichols and Board Members:

It is our understanding that the Air Resources Board (CARB) is soon to consider the investment plan of Electrify America to satisfy the consent decree for air quality standards violations related to VW vehicles and that the Zero Net Energy Community project for the City of Carson is a possible target location. As such, we wish to provide our support for both Electrify America to meet its obligations and wish to further support the role of the City of Carson. The tea

First, we note the significance that Electrify America has previously recognized the specific value of an electric vehicle charging infrastructure project in the City of Carson, California in its most recent submission to CARB. Moreover, according to US Census data, Carson is one of the most ethnically diverse cities in the United States (Latino: 37%, Asian: 26%, African American: 24%, White: 24%) with a high percentage of low-income, disadvantaged families. In addition, according to the CalEnviroScreen 3.0, the City has some of the poorest air-quality scores in the State of California (98-100, <https://oehha.ca.gov/calenviroscreen/sb535>) and adjoins refineries, chemical manufacturing facilities, and other major sources of air pollution. Finally, the City of Carson lies in a critical transportation axis where charging options are essential to foster greater adoption of EV such as the I405, I110, I710, and 91 freeways as well as major East-West surface streets.

Of note, the EV charging infrastructure proposal for Electrify America in the Carson community/Charge Bliss project satisfies the following explicit requirements of the consent decree:

1. Create another "Green" City.
2. Provide services to "citizens who live primarily in disadvantaged communities."
3. Foster adoption of zero emission vehicles in a disadvantaged community.
4. Address comprehensive State air quality goals.

Furthermore, we support the overall goals of the Charge Bliss/CEC project to offset all energy usage with co-located renewable generation, mitigate peak load through battery storage, create efficiencies with LED lighting and new mechanical systems, and to actively manage the EV charging infrastructure through cutting-edge control systems designed by the UCLA group. The alliance of the City of Carson, South Bay Cities Council of Governments, Charge Bliss, and many other key stakeholders makes the prospect of overall project success very high. This will be bolstered substantially by Electrify America's prompt commitment to project participation and, specifically, funding of EV infrastructure design, engineering, construction, and operation.

We strongly support CARB in approving the Electrify America plan with specific inclusion of its role in the Carson project. This will bring significant improvement to air quality, health, and welfare of the citizens of this disadvantaged community, increase the adoption of zero emission vehicles, engage students in Science, Technology, Engineering, and Medical (STEM) fields, and significantly improve EV charging infrastructure at key locations including major transportation routes and multi-unit dwellings.

We therefore urge the Air Resources Board to expedite the process for Electrify America to formalize and begin their contribution to this critical project and we further urge the Board to explicitly require Electrify America to specifically participate in the Carson EV charging infrastructure design, engineering, construction, operation, and maintenance. We ask that CARB support and instruct Electrify America to allocate a minimum of \$4.0M for project purposes as soon as possible in the interest of expediting comprehensive designs and engineering to best ensure project success. We believe this demonstration of a Zero Net Energy Community juxtaposed with comprehensive zero emission vehicle infrastructure will both meet the consent decree requirements and lead to recognition of the value of comprehensive "green" energy projects for disadvantaged communities.

Thank you for your time and consideration.

Suzanne Bottlik  
Environmental Science Engineering and Technology Academy at Carson High

[Name}

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-07-05 09:04:45

No Duplicates.

**Comment 3 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Julie  
Last Name: Papike  
Email Address: jpapike@chargebliss.com  
Affiliation: Charge Bliss Inc..

Subject: Letter of Support  
Comment:

Please see the attached letter from the International Trade Education Programs.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/3-vw-zevinvestsup-ws-AGkCcAZiBSYBWAFi.pdf>

Original File Name: ITEP CARB Letter.pdf

Date and Time Comment Was Submitted: 2017-07-05 09:11:15

No Duplicates.

## **Comment 4 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Jon

Last Name: Whitworth

Email Address: [jonw@skellyelectric.com](mailto:jonw@skellyelectric.com)

Affiliation:

Subject: Carson City: Zero Net Energy

Comment:

Please support and direct VW, through its subsidiary Electrify America, to move forward with the Charge Bliss Zero net Energy Community project for the City of Carson <http://www.energy.ca.gov/contracts/GFO-15-312/> as part of the city's plant to satisfy the Consent Decrees with the California Air Resources Board (CARB). This city is precisely the type of community to which this decree is prioritized with its low air quality and economically disadvantaged.

This project is to include 60 charging devices for multi-unit dwellings, workplace, and destination charging, and up to three locations for multiple DC fast charging devices. Additionally, "Drive and Ride" events will be organized to provide incentives at schools and car hailing services throughout the city to encourage the adoption of electric vehicles.

The project will also incorporate solar systems, energy storage systems (batteries), and load management, all to mitigate any energy demands that the installation of a large, new EV charging system would incur.

This is a critical project for all parties concerned, because the installment of this infrastructure will serve a disadvantaged community, improve EV adoption, incorporate renewable energy and load management, and satisfies the Consent Decree of CARB. Please encourage Electrify America to participate.

Thank you,  
Jon Whitworth

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-07-05 08:43:23

No Duplicates.

**Comment 5 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: David

Last Name: Bliss

Email Address: dbliss@chargebliss.com

Affiliation:

Subject: Disadvantaged Communities- Carson California

Comment:

Dear CARB members: we wish to withdraw a previously submitted letter and submit a modification. Thank you for your consideration and for your ongoing commitment to underserved and disadvantaged communities in California. We rise to support Electrify America and CARB in crafting an EV infrastructure solution that serves these critical regions and sincerely hope that you will give deep consideration to the CEC/Charge Bliss project in Carson.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/5-vw-zevinvestsup-ws-BmVWMQR3V2YGLQEz.pdf>

Original File Name: CARB-2017.pdf

Date and Time Comment Was Submitted: 2017-07-05 19:16:32

No Duplicates.

**Comment 6 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Justin

Last Name: Miller

Email Address: jmiller@chargebliss.com

Affiliation:

Subject: Support for Zero Net Energy Project for the City of Carson

Comment:

Please see the attached letter of support and request for the Charge Bliss Zero Net Energy project for the City of Carson and VW Electrify America. Thank you.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/6-vw-zevinvestsup-ws-ViUAcwBxWXpS0wJw.pdf>

Original File Name: Support for Carson - Charge Bliss - Electrify America.pdf

Date and Time Comment Was Submitted: 2017-07-07 11:21:42

No Duplicates.

**Comment 7 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Julie  
Last Name: Papike  
Email Address: jpapike@chargebliss.com  
Affiliation: Charge Bliss Inc.

Subject: VW  
Comment:

Please see the attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/7-vw-zevinvestsup-ws-AmEBZl0uBzZWD1Ix.docx>

Original File Name: CARB\_CBI\_Letter (1).docx

Date and Time Comment Was Submitted: 2017-07-07 12:49:15

No Duplicates.

**Comment 8 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Ryan

Last Name: MacPhee

Email Address: ryan.macphee@gmail.com

Affiliation:

Subject: Please move forward with the VW settlement

Comment:

California and the environment desperately need these charging stations to exist. Please approve the VW settlement as it's been amended and let's begin building the charging infrastructure CA needs. Though you could also add that VW should greatly reduce the cost of their e-golfs as well for low income folks too. And also add some money overall to CA ZEV rebate program.

Sincerely,

Ryan MacPhee

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-07-07 22:37:56

No Duplicates.

## **Comment 9 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Alexandra

Last Name: Anderson Beaulieu

Email Address: luaman@gmail.com

Affiliation:

Subject: Time to go electric

Comment:

To whom it may concern,  
The attachment, is a pictographic representation of the time  
which remains to have electric transportation and renewable energy  
in place. The collected data suggests that CO2 emmissions globally  
are reaching the avoidable limit of 500 ppm of CO2 in the  
atmosphere faster than was initially expected. In otherwords, it  
was anticipated that we had until 2050, as of 1.5 years ago. Due to  
increase in emissions world wide, we shall surpass the limit, 16  
years ealier. Even today, the trajectory has likely been altered  
again, since CO2 is still accumulating in the atmosphere rapidly.

Sincerely,

Alexandra Anderson Beaulieu, BA Biology, Concordia University

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/9-vw-zevinvestsup-ws-WjkGbANrAz1RNgh8.pdf>

Original File Name: Climate Graph Trajectory for Climate Change with credits.pdf

Date and Time Comment Was Submitted: 2017-07-09 17:18:08

No Duplicates.

## **Comment 10 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Jacki

Last Name: Bacharach

Email Address: [jacki@southbaycities.org](mailto:jacki@southbaycities.org)

Affiliation: Executive Director, South Bay Cities COG

Subject: Letter of Support from SBCCOG for City of Carson application

Comment:

Please find the attached letter of support from the South Bay Cities Council of Governments for the City of Carson's application for funds to help become a Zero Net Energy Community.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/10-vw-zevinvestsup-ws-U2RcBQc3VTYCW1Rl.pdf>

Original File Name: 7\_10\_17 SBCCOG letter to CARB re VW settlement grant funds.pdf

Date and Time Comment Was Submitted: 2017-07-12 08:25:51

No Duplicates.

## **Comment 11 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Kenneth

Last Name: Farfsing

Email Address: kfafsing@carson.ca.us

Affiliation: Carson City Manager

Subject: Electrify America Grant - Carson EV Charging Stations

Comment:

To Whom It May Concern:

The City of Carson is committed to being a Zero Energy Community and is working with the South Bay Council of Governments and Charge Bliss to implement a demonstration project for disadvantaged communities that would assist our City greatly in reaching this goal and setting an example for other disadvantaged communities that positive environmental changes are possible.

Our City Council recently adopted a resolution supporting the Paris Climate Accord, since we believe local governments need to set an example for our residents and businesses. We have been working with the Council of Governments to implement programs to meet our climate and GHG reduction goals.

As a disadvantaged community in the southwest portion of Los Angeles our residents suffer from some of the greatest health impacts from air pollution in Southern California. The City is one of only two in the state who operate stroke centers for our residents and the residents from surrounding communities who suffer from strokes related to air pollution.

The ZEV investment in the City of Carson would greatly assist the City in reaching our Zero Energy, sustainability and GHG reduction goals, setting a positive regional example that disadvantaged communities can improve the environment. Please don't hesitate to contact us if you have any questions or need additional information as you review our grant.

Thank you for your consideration.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-07-12 13:05:27

No Duplicates.

**Comment 12 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Jordan

Last Name: Ramer

Email Address: [jordan@evconnect.com](mailto:jordan@evconnect.com)

Affiliation:

Subject: Support for rapid consideration and quick approval of the Cycle 1 CA ZEV Investment Plan

Comment:

See the attached letter from EV Connect.

Thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/12-vw-zevinvestsup-ws-AmcBcQNhU18FLIMM.pdf>

Original File Name: EVC - CARB Support Letter 7-12-2017.pdf

Date and Time Comment Was Submitted: 2017-07-12 16:07:07

No Duplicates.

## **Comment 13 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Dianne

Last Name: Thomas

Email Address: dwbraids@yahoo.com

Affiliation: Resident

Subject: EV Design in Carson, California

Comment:

Dear CARB Leadership:

The city of Carson is a very diverse city located in Los Angeles County. It is surrounded by the 110 freeway, the 405 freeway, the 91 freeway and the 710 freeway. TESORO oil refinery, Shell oil and Kinder Morgan refinery join these freeways in contributing to the poor air quality experienced by Carson residents on a daily basis. Our city officials and staff are working tirelessly to correct this problem. Our world is moving rapidly towards clean renewable energy. Electric cars is a major element in reaching our goal. Critical to encouraging the purchase of EV's is an infrastructure that supports them. To build such an infrastructure, funds are a must. The Volkswagen settlement is essential to our quest to improve the lives of the residents in Carson. I am asking you to choose Carson as the city to become the recipient of the VW funding. Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-07-12 21:36:33

No Duplicates.

## **Comment 14 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Kelvin

Last Name: Brown Sr

Email Address: sdaikb@gmail.com

Affiliation:

Subject: the Volkswagen Settlement - Supplement to the California ZEV Investment Plan

Comment:

"Dear CARB Leadership:

We urge you to expedite putting the consent decree with VW into action through its subsidiary Electrify America as soon as possible. This will be critically important to the expansion of electric vehicle charging infrastructure throughout the state. In particular, we rise to support the importance of Electrify America investing in disadvantaged communities that have failed to adequately benefit from other such programs. Specifically, we would like to draw CARB's attention to the proposal for Electrify America to deploy EV charging infrastructure in the City of Carson, California as a hallmark project that addresses all of the consent decree imperatives for underserved and disadvantaged communities."

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-07-12 22:21:17

No Duplicates.

## **Comment 15 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: LaRhonda

Last Name: Brown

Email Address: lapopcorn@brownspot.net

Affiliation: Carson Resident for 60 Years

Subject: Electrify America Grant (VW Settlement)

Comment:

Dear CARB Leadership:

We urge you to expedite putting the consent decree with VW into action through its subsidiary Electrify America as soon as possible. This will be critically important to the expansion of electric vehicle charging infrastructure throughout the state. In particular, we rise to support the importance of Electrify America investing in disadvantaged communities that have failed to adequately benefit from other such programs. Specifically, we would like to draw CARB's attention to the proposal for Electrify America to deploy EV charging infrastructure in the City of Carson, California as a hallmark project that addresses all of the consent decree imperatives for underserved and disadvantaged communities.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-07-13 09:18:59

No Duplicates.

**Comment 16 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Terry  
Last Name: O'Day  
Email Address: terry.oday@evgo.com  
Affiliation: EVgo Services LLC

Subject: Support for Approval of Cycle 1 Plan  
Comment:

Please see attached support letter

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/16-vw-zevinvestsup-ws-AHYFdARaUWEDfAhr.pdf>

Original File Name: VW Cycle 1 Comments of EVgo 201707.pdf

Date and Time Comment Was Submitted: 2017-07-13 09:52:04

No Duplicates.

## **Comment 17 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Reata

Last Name: Kulcsar

Email Address: rkulcsar@carson.ca.us

Affiliation: City of Carson

Subject: VW Settlement Support Letter for Carson Project

Comment:

Please see the attached letter from the City of Carson's Mayor.

The attached letter shows the City's support for Electrify America's plan and wishes to further support the role of the City of Carson in the process.

The letter references the Carson Community/Charge Bliss's EV charging infrastructure proposal and it reiterates that the submitted proposals exceeds the requirements of the consent decree to:

1. Create another "Green" City.
2. Provide services to "citizens who live primarily in disadvantaged communities.
3. Foster adoption of zero emission vehicles in a disadvantaged community. and
4. Address comprehensive State air quality goals.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/17-vw-zevinvestsup-ws-BWZTPFAIU3kGXwlm.pdf>

Original File Name: City of Carson - VW Settlement Support Letter 7.13.17.pdf

Date and Time Comment Was Submitted: 2017-07-13 13:12:09

No Duplicates.

## **Comment 18 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Dr. Barbara

Last Name: Palmer

Email Address: drbarbarapalmer@yahoo.com

Affiliation:

Subject: The California ZEV Investment Plan

Comment:

Dear CARB Leadership:

I am urging you to expedite putting the consent decree with VW into action through its subsidiary Electrify America as soon as possible. This will be critically important to the expansion of electric vehicle charging infrastructure throughout the state. In particular, I am supporting the importance of Electrify America investing in Carson, California.

I purchased my home in Carson in 1972. As an active civic minded individual, I have joined with my neighbors to support other projects that enhance and improve our city and neighborhoods.

As more and more homeowners install solar panels and explore the purchase of energy efficient vehicles, it is ever more important that the infrastructure be in place to encourage expansion of efforts to save our planet and environment for the future. As resources diminish we must conserve where and when we can.

This is a wonderful opportunity for Carson, California and our citizens. We are a progressive city and enjoin you to include us in this endeavor.

Sincerely,  
Barbara S. Palmer

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-07-13 14:37:36

No Duplicates.

**Comment 19 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

This comment was posted then deleted because it was unrelated to the Workshop item or it was a duplicate.

**Comment 20 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Ralph

Last Name: Propper

Email Address: rpropper@jps.net

Affiliation: Environmental Council of Sacramento

Subject: Support for Sacramento host for Green City

Comment:

The Environmental Council of Sacramento continues to support the decision by Electrify America to choose Sacramento as the host for the Green City. For the reasons specified in our response to the original submission, we believe that Sacramento is the best choice.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-07-13 21:05:40

No Duplicates.

**Comment 21 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Mike

Last Name: Anderson

Email Address: mike.anderson@efacec.com

Affiliation: Efacec USA, Inc.

Subject: Quick Approval of EA's Supplement to the CA ZEV Investment Plan

Comment:

Quick Approval of EA's Supplement to the CA ZEV Investment Plan

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/22-vw-zevinvestsup-ws-VDFdPVY2WWkGZQJh.pdf>

Original File Name: Efacec - comments on CARB approval of EA ZEV plan.pdf

Date and Time Comment Was Submitted: 2017-07-14 07:25:04

No Duplicates.

**Comment 22 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Kitty

Last Name: Adams

Email Address: kitty.adams@adoptacharger.org

Affiliation:

Subject: Support for Electrify America First 30-month ZEV investment plan

Comment:

Please see attached letter of support for EA first 30-month ZEV investment. Thanks! Kitty

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/23-vw-zevinvestsup-ws-VzRcO1ckUmNRCAJ0.docx>

Original File Name: CARB VW Feedback.docx

Date and Time Comment Was Submitted: 2017-07-14 09:28:59

No Duplicates.

## Comment 23 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.

First Name: Siliencio J.

Last Name: DuBueno

Email Address: is.this.equitable@gmail.com

Affiliation:

Subject: If this "is not a penalty", then what is it?

Comment:

Madame Chair Nichols and Esteemed Committee Members:

"The Cycle 1 CA ZEV Investment Plan lays out a business investment, not a penalty payment plan[.]" (Electrify America, on behalf of Volkswagen, Supplement to the California ZEV Investment Plan / Cycle 1, at 2 (Jun. 29, 2017)).

What is this ZEV Investment Plan if it is not a penalty and where does ARB's authority to enter into it stem from? Is this a mitigation action? Is it a supplemental environmental project? Is this even equitable and fair? I would argue, and I believe the Law Reviews of the World will agree in the near future, that this—in its current form—qualifies as none of the above.

I urge the Board and its Commissioners not to approve this self-dealing, anti-competitive settlement simply. Just because it allegedly resolves and addresses the liability and culpability of the greatest intentional fraud ever carried out on a global scale, does not make it true.

The audacity and brazenness that is evidenced in just the first two paragraphs of this Supplemental Filing is absurd and shows just how little respect Volkswagen has for the rule of law, the spirit of this Consent Decree as approved by the Ninth Circuit, and traditional notions of fair competition, equity, and justice. We should NEVER back down from seeking unfettered justice against those who wilfully harm our environment and intentionally defraud our fellow Californians simply because the violator is a massive corporation from a foreign nation able to hire the largest, most powerful law firms. We have alternative remedies available to us, and we should continue pursuing them until the final Settlement—in its entirety—is fair and equitable to both American citizens and corporations, which this ZEV Investment Plan is anything but. If we permit this ZEV Investment Plan, what is to prevent VW from then going forward and creating subsidiaries to similarly funnel all of the Appendix D funds back to itself?

While portions of the Volkswagen 2.0-Liter Consent Decree, including the vehicle buyback provisions, are clearly permissible mitigation actions, it appears those activities funded under Appendixes C and D to the Consent Decree could—or should—be, for all intents and purposes, Supplemental Environmental Projects (SEP). Yet, Volkswagen's self-dealing via the funneling of all funds through its wholly-owned subsidiary, Electrify America, are in contravention of all available guidance issued by US EPA and CARB regarding SEPs. (Cal. Air Res. Bd., Final Draft, Supplemental Environmental Projects Policy (Oct. 17, 2016)). No other violator in the State of California has been permitted to benefit from its own SEP since the inception of these programs after the Dynegy (EVgo) Settlement. Additionally, based upon the final civil penalties levied by CARB, the ZEV Investment Plan exceeds the permitted 50% maximum allocation of a civil penalty toward an SEP

that California law would otherwise permit after Jan. 1, 2017. Thus, this cannot and does not qualify as an SEP—which is even riskier for California, its environment, citizens, and industry.

If this ZEV Investment cannot qualify as an SEP, then I believe the remaining source of authority for this type of action is a very slippery slope in that it will preclude all of these activities targeted under Appendixes C and D from being used as SEPs in the future by any other violators in the State of California. If Appendixes C and D are to be considered mitigation actions instead of Supplemental Environmental Projects, then the Board risks precluding—rather, it is affirmatively precluding—nearly all sustainable transportation projects from being performed as SEPs in the future. A mitigation action is one “the government believes a court could order as injunctive relief”, whereas an SEP is a voluntary project which otherwise “cannot be secured outside the settlement context.” (U.S. Envtl. Prot. Agency, Memorandum, Securing Mitigation as Injunctive Relief in Certain Civil Enforcement Settlements (2nd edition) (Nov. 14, 2012). Available at <https://www.epa.gov/sites/production/files/2016-08/documents/2ndeditionsecuringmitigationmemo.pdf>).

Therefore, any activity authorized under this Consent Decree, which is in and of itself a form of injunctive relief, cannot be used in the future as an SEP because it has now been proven to be obtainable through injunctive relief as ordered by the Courts in the 9th Circuit. Beware the precedent you are amending and setting by permitting this ZEV Investment Plan to be approved in its current form.

Also of importance, Volkswagen should not be able to utilize this settlement for the tax-deductible establishment of a wholly-owned national electric vehicle charging network. Especially not when they have the audacity to claim this “is not a penalty [...]” in the introduction of this supplemental filing. What will ARB do when it becomes clear through tax records that this document is chock full of perjury and deceit—that VW is indeed claiming this as a penalty for beneficial tax purposes? Do not permit this blatant perjury to go unmet, and please disclose who permitted this outlandish statement of impunity to be included in this Supplemental Filing so that we, the interested public, may submit proper complaints to the relevant State Bar Association(s), if appropriate.

I'm not even going to dive deeply into how unfair and prejudicial this ZEV Investment Plan is to Hydrogen Fuel Cell technologies as well as the heavy-duty sector in its entirety by VW forcing them all to squabble over the limited Appendix D funds—I believe and hope other commentators will cover that in depth. VW's anti-competitive business judgment/decision to avoid committing funding for installing even a single hydrogen fueling station under the CA ZEV Investment Plan, to wit during any of the 3 phases, is contrary to the goals of this Consent Decree and California's own policy directives and environmental goals. Additionally, forcing all light-duty hydrogen refueling stations, each costing \$1-million or more, to share funding with the heavy-duty sector severely limits the maximum reductions in NOx and other criteria pollutants which are the true aim of Appendix D and most achievable in the heavy-duty sector.

You are the California Air Resources Board. You, as employees and Commissioners, represent one of the most powerful governmental agencies in the world. Do not back down, do not give in, and do not give up. This ZEV Investment Plan is inequitable, unfair, unjust, and straight up lies and deceit coming from a company that has repeatedly shown its proclivity and preference for fraud and anti-competitive behavior. Do not forget what they did and the lies they continued to spew long after their fraud was revealed. If you permit this ZEV Investment Plan to proceed in its current form then the precedent this sets will de-fang the Board for future enforcement efforts. Any self-reporting violator in California from

here on out will be able to laugh in your face as they point to this ZEV Investment Plan and say, "Thanks for the tax-deductible investment in my own company's future business model"—and that's assuming the Courts let you enforce SEPs after this chicanery. Alternatively, any efforts to promote sustainable transportation through an SEP in California could henceforth be challenged on the basis they are precluded as potential forms of injunctive relief, which is a strong tactic that entrenched oil majors and OEMs will happily use against you and their zero-emission competition. I know there is a reason CARB, US EPA, and VW avoided calling any portions of the Consent Decree an "SEP" or a "mitigation action", but now that VW has admitted on the record that this is "not a penalty", you must ask yourselves: What is this? That answer is far from justice and it may indeed be the unwitting and unforeseen death knell for CARB's environmental protection and enforcement efforts.

Signed,

A Concerned Californian  
Submitted Anonymously to Avoid Potential Prejudice and Retaliation

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-07-14 10:45:55

No Duplicates.

**Comment 24 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Emanuel

Last Name: Wagner

Email Address: [ewagner@californiahydrogen.org](mailto:ewagner@californiahydrogen.org)

Affiliation: California Hydrogen Business Council

Subject: CHBC Comments on VW Supplement Investment Plan

Comment:

Please see the CHBC's concerns with VW's Supplement to the Investment Plan in the attached letter.

Thank you!

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/25-vw-zevinvestsup-ws-UzBSPFU2UWFSCwFi.pdf>

Original File Name: CHBC Comments on VW Supplement Investment Plan.pdf

Date and Time Comment Was Submitted: 2017-07-14 11:36:10

No Duplicates.

**Comment 25 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Tim

Last Name: Kreukniet

Email Address: [tim.kreukniet@ev-box.com](mailto:tim.kreukniet@ev-box.com)

Affiliation: EV-Box

Subject: EV-Box support letter for rapid approval and start of EA California ZEV investment plan.

Comment:

LS, herewith the EV-Box letter to support CARB approval of the EA ZEV supplement.

Tim Kreukniet

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/26-vw-zevinvestsup-ws-BmMHd1R4VGUCA1Mr.pdf>

Original File Name: EV-Box letter of support for CARB approval of EA investment plan.pdf

Date and Time Comment Was Submitted: 2017-07-14 11:18:39

No Duplicates.

**Comment 26 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Cameron

Last Name: Funk

Email Address: [cameron.funk@abm.com](mailto:cameron.funk@abm.com)

Affiliation:

Subject: Support for rapid consideration and approval of the Cycle 1 CA ZEV Investment Plan

Comment:

Dear Chair Nichols,

please consider the attached letter as support for rapid consideration and approval of the Cycle 1 CA ZEV Investment Plan. Hoping that my upload goes through this time, I wish you a great weekend.

With kind regards,

Cameron Funk

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/27-vw-zevinvestsup-ws-VTRRNVE9VVkBZAR1.pdf>

Original File Name: ABM CARB Letter.pdf

Date and Time Comment Was Submitted: 2017-07-14 11:59:19

No Duplicates.

**Comment 27 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Jennifer

Last Name: Gress

Email Address: [jgress@cityofsacramento.org](mailto:jgress@cityofsacramento.org)

Affiliation:

Subject: Sacramento Support for Supplement to Cal ZIP

Comment:

Attached please find the letter of support from Mayor Darrell Steinberg on behalf of the City of Sacramento.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/28-vw-zevinvestsup-ws-UGBUZVR7VzVSYAUr.pdf>

Original File Name: 07.14.17 Sacramento Support Letter to CARB Supplement (FINAL).pdf

Date and Time Comment Was Submitted: 2017-07-14 12:22:35

No Duplicates.

**Comment 28 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Michael

Last Name: Lord

Email Address: michael.lord@toyota.com

Affiliation: Toyota Motor North America

Subject: Toyota Comments on Electrify America's Supplement to the California Investment Plan

Comment:

Please see attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/29-vw-zevinvestsup-ws-AXVTOlcvADwGdFAx.pdf>

Original File Name: Toyota Comments on VWs Supplement Investment Plan Final 07-14-17.pdf

Date and Time Comment Was Submitted: 2017-07-14 12:26:50

No Duplicates.

**Comment 29 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Hannah  
Last Name: Goldsmith  
Email Address: [hannah@caletc.com](mailto:hannah@caletc.com)  
Affiliation: CalETC

Subject: CalETC Comments Re VW First 30-month ZEV Investment Plan Supplement  
Comment:

Please find CalETC's comments attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/30-vw-zevinvestsup-ws-VzQHYARpUGYDcQhr.pdf>

Original File Name: CalETC Comments Re VW First 30-month ZEV Investment Plan Supplement Final.pdf

Date and Time Comment Was Submitted: 2017-07-14 12:40:57

No Duplicates.

**Comment 30 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Eugene

Last Name: Shirley

Email Address: eugene@pandopopulus.com

Affiliation: Pando Populus

Subject: VW Settlement and Disadvantaged Communities

Comment:

Attached, please find our letter of support. Thank you, EUGENE  
SHIRLEY

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/31-vw-zevinvestsup-ws-Wy0HdgdZUXEFZgF1.pdf>

Original File Name: VW Settlement and Disadvantaged Communities.pdf

Date and Time Comment Was Submitted: 2017-07-14 12:47:26

No Duplicates.

## **Comment 31 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Morry  
Last Name: Markowitz  
Email Address: [mmarkowitz@fcfea.org](mailto:mmarkowitz@fcfea.org)  
Affiliation: Fuel Cell & Hydrogen Energy Assn.

Subject: ZIP Supplement  
Comment:

As currently drafted, the Supplement omits investment in hydrogen refueling stations (HFS), a stance that is inconsistent with State efforts, the 2016 ZEV Action Plan, ongoing hydrogen infrastructure investments, the eight-state ZEV MOU, and industry efforts to bring many ZEV models to the market. Therefore, FCHEA asks the ARB to maintain its position of supporting all ZEV technologies by postponing the approval of the Supplement, and working with Volkswagen to amend the Supplement to include HFS investment.

Attachment:

Original File Name: FCHEA Comments 07.14.17.pdf

Date and Time Comment Was Submitted: 2017-07-14 13:30:56

No Duplicates.

**Comment 32 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Morry  
Last Name: Markowitz  
Email Address: mmarkowitz@fchea.org  
Affiliation: Fuel Cell & Hydrogen Energy Assn.

Subject: ZIP  
Comment:

See attached file.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/33-vw-zevinvestsup-ws-AWcGYwBpU2UCZVMM.pdf>

Original File Name: FCHEA Comments 07.14.17.pdf

Date and Time Comment Was Submitted: 2017-07-14 13:34:07

No Duplicates.

**Comment 33 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: David

Last Name: Flaks

Email Address: [david.flaks@laedc.org](mailto:david.flaks@laedc.org)

Affiliation:

Subject: LAEDC Support for Electrify America ZEV Plan

Comment:

See attached for letter of support.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/34-vw-zevinvestsup-ws-WzcAZ1w4BTIHYlAP.pdf>

Original File Name: LAEDC Support Letter for EA ZEV Plan.pdf

Date and Time Comment Was Submitted: 2017-07-14 14:05:24

No Duplicates.

**Comment 34 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Hilary

Last Name: Norton

Email Address: hnorton@tpgre.com

Affiliation:

Subject: FAST LA's Support for Electrify America ZEV Plan

Comment:

See attached letter of support.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/35-vw-zevinvestsup-ws-B2FVMIgAyQKU1ck.pdf>

Original File Name: FAST Support Letter for EA ZEV Plan.pdf

Date and Time Comment Was Submitted: 2017-07-14 14:09:38

No Duplicates.

**Comment 35 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Mike

Last Name: Swords

Email Address: mike@laincubator.org

Affiliation:

Subject: LACI Support Letter for Electrify America ZEV Plan

Comment:

See attached for letter of support.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/36-vw-zevinvestsup-ws-UT0GYQFjUmgLUGl6.pdf>

Original File Name: LACI Support Letter for EA ZEV Plan.pdf

Date and Time Comment Was Submitted: 2017-07-14 14:19:59

No Duplicates.

**Comment 36 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Ellah

Last Name: Ronen

Email Address: ERonen@calfund.org

Affiliation:

Subject: LA n Sync Support for Electrify America ZEV Plan

Comment:

See attached for letter of support.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/37-vw-zevinvestsup-ws-VDhcO1MNV2oEXQJx.pdf>

Original File Name: LA n Sync Support Letter for EA ZEV Plan.pdf

Date and Time Comment Was Submitted: 2017-07-14 14:22:31

No Duplicates.

**Comment 37 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Duane

Last Name: Miller

Email Address: duane.muller@theplayagroup.com

Affiliation:

Subject: The Playa Group Support for Electrify America ZEV Plan

Comment:

Please see attached for letter of support.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/38-vw-zevinvestsup-ws-VCRdN1U1WHJXMFcI.pdf>

Original File Name: Playa Group Support Letter for EA ZEV Plan.pdf

Date and Time Comment Was Submitted: 2017-07-14 14:23:57

No Duplicates.

**Comment 38 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Fernando

Last Name: Cazeras

Email Address: fernando.cazares@tpl.org

Affiliation:

Subject: Trust for Public Land Support for Electrify America ZEV Plan

Comment:

Please see attached for letter of support.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/39-vw-zevinvestsup-ws-Wi5XIwF1V3dXJVMM.pdf>

Original File Name: Trust for Public Lands Support Letter for EA ZEV Plan.pdf

Date and Time Comment Was Submitted: 2017-07-14 14:26:48

No Duplicates.

## **Comment 39 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Todd  
Last Name: DeYoung  
Email Address: todd.deyoung@valleyair.org  
Affiliation: SJVAPCD

Subject: Supplement to the California ZEV Investment Plan Cycle 1 Comment Letter  
Comment:

Good afternoon,

Attached to this includes the San Joaquin Valley Air Pollution Control District's Comment letter regarding the Supplement to the California ZEV Investment Plan Cycle 1.

Much appreciated,

Dante S. Sanson  
Air Quality Specialist II  
Strategies & Incentives Department  
San Joaquin Valley Air Pollution Control District  
1990 East Gettysburg Ave, Fresno CA 93726  
Phone: (559) 230-5807 Fax: (559) 230-6112  
Dante.Sanson@valleyair.org  
www.valleyair.org

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/40-vw-zevinvestsup-ws-UyBcL1wtByQDaVUw.pdf>

Original File Name: Supplement to the California ZEV Investment Plan Cycle 1 Comment Letter.pdf

Date and Time Comment Was Submitted: 2017-07-14 14:35:36

No Duplicates.

**Comment 40 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Duane

Last Name: Muller

Email Address: duane.muller@theplayagroup.com

Affiliation:

Subject: The Playa Group Support for Electrify America ZEV Plan

Comment:

See attached letter of support.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/41-vw-zevinvestsup-ws-BnZcNIU1UHpVMghX.pdf>

Original File Name: Playa Group Support Letter for EA ZEV Plan.pdf

Date and Time Comment Was Submitted: 2017-07-14 14:46:09

No Duplicates.

**Comment 41 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Oscar

Last Name: Monge

Email Address: oscar@trustsouthla.org

Affiliation:

Subject: TRUST South LA Support for Electrify America ZEV Plan

Comment:

See attached letter of support.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/42-vw-zevinvestsup-ws-UCRQJFQgVnYAcIIN.pdf>

Original File Name: TRUST South LA Support Letter for EA ZEV Plan.pdf

Date and Time Comment Was Submitted: 2017-07-14 14:52:16

No Duplicates.

## **Comment 42 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Bob

Last Name: Gaffney

Email Address: [bgaffney@advancedemission.com](mailto:bgaffney@advancedemission.com)

Affiliation:

Subject: VW Settlement

Comment:

Our company made submission for a hydrogen fueling infrastructure grant in August 2016. We did not find out till Feb 2017 that we did not win the grant here in Fresno. Our CHIT score was very low in Fresno. We even had a business case model for a dual station that would accelerate hydrogen fuel usage in Fresno with commercial fueling such as hydrogen forklifts and hydrogen emergency power service units. We have now had to go to an option B scenario to dispense hydrogen. We were counting on VW settlement to help us for hydrogen station infrastructure. I am encouraging decision makers to take another look at where to dispense the funds. Hydrogen should receive monies from this settlement. I could list 100 reasons why but this is not the platform to do so.

Thank you

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2017-07-14 14:55:18

No Duplicates.

**Comment 43 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Paul

Last Name: Fukumoto

Email Address: pfukumoto@fce.com

Affiliation: FuelCell Energy, Inc.

Subject: FuelCell Energy comments on VW Settlement Plan Supplement

Comment:

FuelCell Energy appreciates the opportunity to comment on Electrify America's June 29, 2017, Supplement to the California Investment Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/44-vw-zevinvestsup-ws-AWddOARgU18GY1Q7.pdf>

Original File Name: FCE comments on VW Settlement Plan Supplement.pdf

Date and Time Comment Was Submitted: 2017-07-14 15:13:19

No Duplicates.

**Comment 44 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Angela

Last Name: Konert

Email Address: angela.konert@bmwna.com

Affiliation: BMW of NA LLC

Subject: BMW NA comments on the supplement to VW ZEV Investment Plan

Comment:

Dear Sir or Madam,

Please find enclosed the comments from BMW on the supplement to VW ZEV Investment Plan.

Please let me know should you have any questions or concerns.

With kind regards,

Angela Konert

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/46-vw-zevinvestsup-ws-VmRUYIRkBGAANldg.pdf>

Original File Name: 20170714\_ZEV Investment Plan\_Comment\_BMW.pdf

Date and Time Comment Was Submitted: 2017-07-14 15:10:55

No Duplicates.

**Comment 45 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: laura

Last Name: stuchinsky

Email Address: laura.stuchinsky@sanjoseca.gov

Affiliation: City of San Jose

Subject: Comments on Supplement to VW ZEV Investment Plan

Comment:

See attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/47-vw-zevinvestsup-ws-B2tRIwNwAg5QIgJt.pdf>

Original File Name: Ltr to CARB on VW Investment Plan\_final.pdf

Date and Time Comment Was Submitted: 2017-07-14 15:28:42

No Duplicates.

**Comment 46 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: David

Last Name: Reichmuth

Email Address: dreichmuth@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: Union of Concerned Scientists comments on the supplemental plan

Comment:

Please see the attached comments from UCS on the supplement to the CA ZEV Investment Plan.

Thank you,  
David Reichmuth

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/48-vw-zevinvestsup-ws-UCYHdlIMUWFXMAFe.pdf>

Original File Name: VW CA investments supplemental plan comments to ARB.pdf

Date and Time Comment Was Submitted: 2017-07-14 15:31:07

No Duplicates.

**Comment 47 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Paul

Last Name: Lau

Email Address: paul.lau@smud.org

Affiliation:

Subject: Support letter from SMUD

Comment:

See attached support letter from SMUD.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/49-vw-zevinvestsup-ws-BmFTOFMNBWcLOgkk.pdf>

Original File Name: GM 17-195 & BOD 2017-021.pdf

Date and Time Comment Was Submitted: 2017-07-14 15:10:51

No Duplicates.

**Comment 48 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Ken

Last Name: Mak

Email Address: kmak@baaqmd.gov

Affiliation: Bay Area Air Quality Management District

Subject: Comments on VW ZEV Investment Plan Supplement

Comment:

Comments on the VW ZEV Investment Plan Supplement from the Metropolitan Transportation Commission and the Bay Area Air Quality Management District are attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/50-vw-zevinvestsup-ws-UzBT0lwU20KaVI8.pdf>

Original File Name: Comment Letter to CARB - VW Supplement.pdf

Date and Time Comment Was Submitted: 2017-07-14 15:48:16

No Duplicates.

**Comment 49 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Linda

Last Name: Urata

Email Address: projectcleanairmanager@gmail.com

Affiliation: SJV EV Partnership

Subject: SJVEVP Support and Comments On Supplement to the ZEV CA Investment Plan

Comment:

Thank you for this opportunity to provide comments on the Electrify America Supplement to the California ZEV Investment Plan.

Sincerely,

Linda Urata

on behalf of the San Joaquin Valley Electric Vehicle Partnership

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/51-vw-zevinvestsup-ws-B3QAbAdwUGZRIQd3.pdf>

Original File Name: SJVEVP Comments to CARB on EA Supplement to the Cycle 1 ZEV Investment Plan 7 2017.pdf

Date and Time Comment Was Submitted: 2017-07-14 16:08:26

No Duplicates.

**Comment 50 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Joel  
Last Name: Espino  
Email Address: [joele@greenlining.org](mailto:joele@greenlining.org)  
Affiliation: The Greenlining Institute

Subject: Comments on Volkswagen's "Supplement to the California ZEV Investment Plan: Cycle 1"  
Comment:

Please find comments to VW's Supplement attached.

Best,  
Joel Espino

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/52-vw-zevinvestsup-ws-WjkBZgNwVmcDWIIx.pdf>

Original File Name: CARB Comments\_VW Supplement Info\_Cycle 1.pdf

Date and Time Comment Was Submitted: 2017-07-14 16:16:24

No Duplicates.

**Comment 51 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Cody

Last Name: Hooven

Email Address: chooven@sandiego.gov

Affiliation:

Subject: Electrify America Supplemental Investment Plan

Comment:

Please see attached comment letter from the City of San Diego.

Thank you,  
Cody Hooven

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/53-vw-zevinvestsup-ws-UDxcP1InVHMDYFIg.pdf>

Original File Name: Letter- CARB Electrify America Supplement Comment Letter\_071417.pdf

Date and Time Comment Was Submitted: 2017-07-14 16:15:49

No Duplicates.

**Comment 52 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Greg

Last Name: Lary

Email Address: lary@avinc.com

Affiliation: AeroVironment, Inc.

Subject: AeroVironment Support of Cycle 1 CA Zev Investment Plan

Comment:

AeroVironment Inc. supports the rapid and timely approval of Electrify America's CA ZEV Investment Plan. Please see attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/54-vw-zevinvestsup-ws-WjtVNI0uWWUKeGFo.pdf>

Original File Name: AeroVironment EA Letter of Support\_ July 14 2017\_[1].pdf

Date and Time Comment Was Submitted: 2017-07-14 15:56:42

No Duplicates.

**Comment 53 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Marco

Last Name: Anderson

Email Address: anderson@scag.ca.gov

Affiliation:

Subject: SCAG Support for Electrify America ZEV Plan

Comment:

See attached letter of support.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/55-vw-zevinvestsup-ws-WygHYgdnUmZRCAFy.pdf>

Original File Name: SCAG Support Letter for EA ZEV Plan.pdf

Date and Time Comment Was Submitted: 2017-07-14 16:30:19

No Duplicates.

## **Comment 54 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Paul D

Last Name: Hernandez

Email Address: paul.hernandez@energycenter.org

Affiliation: Center for Sustainable Energy (CSE)

Subject: Response to Volkswagen's (VW's) Supplement to the California ZEV Investment Plan, Cycle 1

Comment:

DATE: July 14, 2017

TO: Mr. Mark Williams, Mailstop 3E  
California Air Resources Board (CARB)  
P.O. Box 2815  
Sacramento, CA 95812

SUBMITTED ELECTRONICALLY

FROM: Center for Sustainable Energy®

RE: Response to Volkswagen's (VW's) Supplement to the California ZEV Investment Plan, Cycle 1

Dear Mr. Williams,

Attached, please find the Center for Sustainable Energy's Response to VW's Supplement to the California ZEV Investment Plan, Cycle 1.

CSE appreciates the opportunity provide this response. Please continue to consider CSE a resource on these and other matters, and feel free to contact me (Paul D. Hernandez), CSE's Transportation Electrification Policy Manager, with any questions or for clarifications regarding these comments.

Respectfully Submitted,

-Paul D. Hernandez

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/56-vw-zevinvestsup-ws-BnRUNwd1BCcDalQ6.pdf>

Original File Name: Response of Center for Sustainable Energy to VW Supplement 7.14.2017 FINAL PDF.pdf

Date and Time Comment Was Submitted: 2017-07-14 16:31:17

No Duplicates.

**Comment 55 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Pedro

Last Name: Hernandez

Email Address: phernandez@leadershipcounsel.org

Affiliation: Leadership Counsel

Subject: Response to Supplement Investment Plan

Comment:

Thank you for your consideration of these comments. Should you have any questions, please contact Abigail Ramirez or Pedro Hernández at (559) 369-2790.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/57-vw-zevinvestsup-ws-WylQM1QIVmpROQV2.pdf>

Original File Name: Reponse to Supplement.pdf

Date and Time Comment Was Submitted: 2017-07-14 16:31:02

No Duplicates.

**Comment 56 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Lauren

Last Name: Faber-O'Connor

Email Address: lauren.faber@lacity.org

Affiliation:

Subject: City of LA, Mayor Garcetti Support for Electrify America ZEV Plan

Comment:

See attached letter of support.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/58-vw-zevinvestsup-ws-VzQGaQB1ACoKU1Q7.pdf>

Original File Name: City of LA, Mayor Letter for EA ZEV Plan.pdf

Date and Time Comment Was Submitted: 2017-07-14 18:39:28

No Duplicates.

**Comment 57 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Bryn

Last Name: Lindbald

Email Address: blindblad@climateresolve.org

Affiliation:

Subject: Climate Resolve Support for Electrify America ZEV Plan

Comment:

See attached letter of support.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/59-vw-zevinvestsup-ws-VjVQOlM7Az1SNQdz.pdf>

Original File Name: Climate Resolve Support Letter for EA ZEV Plan.pdf

Date and Time Comment Was Submitted: 2017-07-14 18:42:53

No Duplicates.

**Comment 58 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Dolores

Last Name: Barajas-Weller

Email Address: dolores@calcleanair.org

Affiliation: Central Valley Air Quality Coalition (CV)

Subject: CVAQ Comments on VW Settlement - Supplement to the California ZEV Investment Plan

Comment:

Please see the attached comments on the Volkswagen Settlement - Supplement to the California ZEV Investment Plan, from the Central Valley Air Quality Coalition.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/60-vw-zevinvestsup-ws-VTZUJFc3VXdVDAdx.pdf>

Original File Name: CVAQ VW Supplement Comment Letter.pdf

Date and Time Comment Was Submitted: 2017-07-14 18:44:07

No Duplicates.

**Comment 59 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Rick

Last Name: Teebay

Email Address: RTeebay2@isd.lacounty.gov

Affiliation:

Subject: LA County Rick Teebay Support for Electrify America ZEV Plan

Comment:

See attached letter of support.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/61-vw-zevinvestsup-ws-AHJUO1c1U2tQIlc.pdf>

Original File Name: RickTeebay LA County Support Letter for EA ZEV Plan.pdf

Date and Time Comment Was Submitted: 2017-07-14 18:45:46

No Duplicates.

**Comment 60 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Mark

Last Name: Pastrone

Email Address: [mpastrone@semaconnect.com](mailto:mpastrone@semaconnect.com)

Affiliation: SemaConnect

Subject: Support for rapid approval of the Cycle I EA California ZEV investment plan

Comment:

SemaConnect supports rapid approval of the Electrify America ZEV investment plan as described in the attached letter.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/62-vw-zevinvestsup-ws-VSZUN1U5VGZVMFM8.pdf>

Original File Name: SemaConnect Letter - Supports EA Program 071417.pdf

Date and Time Comment Was Submitted: 2017-07-14 18:45:31

No Duplicates.

**Comment 61 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Mikael

Last Name: Sloth

Email Address: mslot@nelhydrogen.com

Affiliation: Nel Hydrogen

Subject: Electrify America applies contradictory argumentation to avoid investments in hydrogen

Comment:

Please see attached comment from Nel Hydrogen.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/63-vw-zevinvestsup-ws-BWsCYVY7U18LblM8.pdf>

Original File Name: NEL\_comment-ARB-VW\_July-14-2017.pdf

Date and Time Comment Was Submitted: 2017-07-14 19:17:42

No Duplicates.

## Comment 62 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.

First Name: George L

Last Name: Parrott

Email Address: gparrott@csus.edu

Affiliation: President, SacEV

Subject: Support Letter for Sacramento Award as Green City

Comment:

To: California Air Resources Board

RE: VW Electrify America, Cycle 1 Investment Plan

The Sacramento Electric Vehicle Association (SacEV), is a 600+ member

organization, and as stated by Ron Freund, Chairman of the Electric Auto

Association, "... one of the largest and most active EAA chapters in the country."

We strongly support the choice of Sacramento as the first awardee for the Green

Cities program for many reasons.....

For years SacEV has partnered with SMUD, car dealers and many community

groups to initiate the wider understanding and adoption of these 21st

Century mass produced alternatives to traditional polluting choices.

The Sacramento area enjoys unique support from SMUD with strong coordination of educational outreach programs hosted, planned, and staged

by SacEV. No other area of the state has this track record of cooperation

and effective impact in bringing the understanding of how EVs can improve

our quality of life.

The non-profit SacEV has the outstanding history of educational outreach to schools, colleges, businesses, publications and public events to enlighten the public about this new technology.

Even with extremely limited funds, SacEV, members invested over 4000 hours of volunteer time with its partners, put on 55 EV educational events in 2015 and 2016 plus wide ranging activities which included:

&#9679; 3,570 Test drives for people interested in experiencing driving electric.

&#9679; 15,265 One-on-one conversations on whether an EV can work for you.

&#9679; 162 Member owned EVs provided for event support (show and tell) at over 55 events.

&#9679; Providing educational scholarships for Automotive Technology programs.

&#9679; Bimonthly public informational events on EV offerings, programs, infrastructure with an opportunity to meet EV industry experts for direct Q & A on "how an EV works for you."

&#9679; Engaged State Government offices and utilities in consultation on policy and planning for the adoption and infrastructure needed for EVs.

&#9679; Working closely with the national Electric Auto Association to share ideas, success strategies and programs that work.

&#9679; Published several articles not just across the country, but also into Germany, about EV events and activities, along with tips and techniques for holding successful EV events.

&#9679; Provided SacEV generated public material to train Auto Sales reps with regard to success in the EV sales process.

&#9679; Co-developed Public Service Announcements highlighting the excitement and pleasure of driving electric.  
This past history demonstrates that the Sacramento community has the foundation already in place to develop a further expansive and effective educational outreach program when adequate funding is actually available.

Community Experience in Partnerships for Collective Action:

The following have consistently demonstrated successful collaboration in promoting the adoption of EVs in this area already:

&#9679; SacEV  
&#9679; SMUD,  
&#9679; Sacramento, Placer, El Dorado and Yolo counties,  
&#9679; Sacramento and neighboring cities,  
&#9679; Sacramento Clean Cities,  
&#9679; Council of Governments,  
&#9679; California Auto Museum,  
&#9679; UC Davis Institute of Transportation,  
&#9679; Air Quality Districts,  
&#9679; Sierra Club,  
&#9679; Auto dealerships,  
&#9679; Sacramento Area Regional Technology Alliance,  
&#9679; ChargePoint, ClipperCreek, and other EVSE manufacturers  
&#9679; Kaiser-Permanente and other businesses,  
&#9679; other local cities/governments in the region

The Sacramento area has a unique, substantial and active history of cooperative efforts between governmental, public, and community groups in promoting community interests in health. The Green City award would allow that history to become a future with a major impact on improving community health and wellness, and extend to broader regions.

Respectfully Submitted,  
George L. Parrott, Ph.D., President, Sacramento Electric Vehicle Association  
Guy Hall, Chief Strategic Officer, Sacramento Electric Vehicle Association

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/64-vw-zevinvestsup-ws-AHMCZVw+ACEBZgVo.pdf>

Original File Name: Sacramento Green City SacEV July 14.pdf

Date and Time Comment Was Submitted: 2017-07-14 20:20:50

No Duplicates.

**Comment 63 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Thomas

Last Name: Ashley

Email Address: tom@greenlots.com

Affiliation: Greenlots

Subject: Comments Supporting CARB Approval of EA's CA ZEV Investment Plan

Comment:

Greenlots submits the attached comments in support of CARB approval of Electrify America's Cycle 1 California ZEV Investment Plan.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/65-vw-zevinvestsup-ws-UTYHc1M3BDJWPgll.pdf>

Original File Name: Greenlots Comments in Support of EA ZEV Investment Plan Approval.pdf

Date and Time Comment Was Submitted: 2017-07-14 20:39:46

No Duplicates.

**Comment 64 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: James

Last Name: Hall

Email Address: jamie.hall@gm.com

Affiliation: General Motors

Subject: GM Comments on the Electrify America California ZEV Investment Plan Supplement

Comment:

Attached are comments from General Motors on the Electrify America California ZEV Investment Plan Supplement.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/66-vw-zevinvestsup-ws-B2BROIMNBz1S0Ii.pdf>

Original File Name: GM Input on Electrify America Supplement for California final.pdf

Date and Time Comment Was Submitted: 2017-07-14 21:34:33

No Duplicates.

**Comment 65 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: David

Last Name: Riccitello

Email Address: Dricciello@bos.lacounty.gov

Affiliation:

Subject: Electrify America in the County of Los Angeles

Comment:

Attached.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/67-vw-zevinvestsup-ws-UzoAa1U1VGAFZIJ8.jpeg>

Original File Name: image.jpeg

Date and Time Comment Was Submitted: 2017-07-14 22:01:01

No Duplicates.

**Comment 66 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Ivor

Last Name: John

Email Address: ivorjohn@cox.net

Affiliation: Independent Consultant

Subject: VW Investment Plan Supplement

Comment:

See attached comments

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/68-vw-zevinvestsup-ws-BXMFdAFFWGgFbAdq.zip>

Original File Name: VW Comments.zip

Date and Time Comment Was Submitted: 2017-07-14 22:47:57

No Duplicates.

**Comment 67 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: cris

Last Name: liban

Email Address: libane@metro.net

Affiliation:

Subject: Electrify America 2.0L California ZEV Investment Plan

Comment:

please see letter attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/69-vw-zevinvestsup-ws-UWNXPVMNVn8FZlUj.docx>

Original File Name: 2L ZEV Supplement Letter of Support 7.11.2017.docx

Date and Time Comment Was Submitted: 2017-07-14 23:59:45

No Duplicates.

**Comment 68 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Marvin

Last Name: Moon

Email Address: Marvin.Moon@ladwp.com

Affiliation: LADWP

Subject: Comments on the ZEV Investment Supplement

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/70-vw-zevinvestsup-ws-AXIFdgFwV3QGb1Qm.pdf>

Original File Name: Support for Electrify Americas Proposal for Electric Vehicle Infrastructure.pdf

Date and Time Comment Was Submitted: 2017-07-17 13:34:08

No Duplicates.

**Comment 69 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Rachael

Last Name: Koss

Email Address: rkoss@adamsbroadwell.com

Affiliation:

Subject: Comments on the ZEV Investment Supplement

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/71-vw-zevinvestsup-ws-VDhVNIEkV3AAY1Ai.pdf>

Original File Name: Letter to CARB re VW Plan.pdf

Date and Time Comment Was Submitted: 2017-07-17 13:39:13

No Duplicates.

**Comment 70 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Anne

Last Name: Smart

Email Address: anne.smart@chargepoint.com

Affiliation:

Subject: ChargePoint Comments on ZEV Investment Plan Supplement Comment

Comment:

See attached:

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/72-vw-zevinvestsup-ws-UzAFa1Q0UHEAYVQx.pdf>

Original File Name: ChargePoint\_VW ZIP Supplement Comments\_07142017\_FINAL.pdf

Date and Time Comment Was Submitted: 2017-07-17 15:18:47

No Duplicates.

**Comment 71 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: John

Last Name: Tillman

Email Address: John.Tillman@nissan-usa.com

Affiliation: Nissan

Subject: Comments on the Volkswagen Settlement Supplement

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/73-vw-zevinvestsup-ws-WzVUO1YkWHhXMABu.pdf>

Original File Name: nissan\_combo.pdf

Date and Time Comment Was Submitted: 2017-07-24 10:03:23

No Duplicates.

**Comment 72 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Senator Toni

Last Name: Atkins

Email Address: rachel.ronkowski@sen.ca.gov

Affiliation:

Subject: Comments on the Volkswagen Settlement Supplement

Comment:

See attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/74-vw-zevinvestsup-ws-VjUAZwR3BDULUgRo.pdf>

Original File Name: CARB Letter 7.26.17.pdf

Date and Time Comment Was Submitted: 2017-07-26 13:38:49

No Duplicates.

**Comment 73 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Ron

Last Name: Nichols

Email Address: [ron.nichols@sce.com](mailto:ron.nichols@sce.com)

Affiliation: Southern California Edison

Subject: VW's First 30-month Zero Emission Vehicle Investment Plan

Comment:

See attachment.

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/75-vw-zevinvestsup-ws-BjZdbFdkUTYEMFNj.pdf>

Original File Name: 07242017 Ltr to Chair Mary Nichols re\_CARB (003).pdf

Date and Time Comment Was Submitted: 2017-07-26 13:38:49

No Duplicates.

**Comment 74 for VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) - 1st Workshop.**

First Name: Linus

Last Name: Farias

Email Address: LJFb@pge.com

Affiliation: PG&E

Subject: PG&E comments to VW Supplement to their ZEV Investment Plan

Comment:

See attached

Attachment: <https://ww2.arb.ca.gov/sites/default/files/BARCU/barcu-attach/76-vw-zevinvestsup-ws-VGZUYgQ0UjYBKgAw.pdf>

Original File Name: 2017-07-24 EA Plan PGE Comment Letter.pdf

Date and Time Comment Was Submitted: 2017-07-27 14:08:47

No Duplicates.

**There are no comments posted to VW Supplement to their ZEV Investment Plan (vw-zevinvestsup-ws) that were presented during the Workshop at this time.**