



December 14, 2016

California Air Resources Board  
1001 I Street  
Sacramento, CA 95815

Re: Volkswagen's Zero Emission Vehicle Investment Commitment Development Process and Investment Areas for Appendix C

Dear California Air Resources Board Members and Staff,

We appreciate the opportunity to provide comments on the Volkswagen's (VW) Appendix C zero emission vehicle (ZEV) Investment in California.

Green Commuter, a minority-woman-owned Benefit Corporation headquartered in California, has developed an innovative system that utilizes a fleet of 100% zero-emission vehicles (ZEV) to provide a combined service of vanpool, car sharing and/or fleet replacement to maximize efficiency, decrease the cost of commuting, and increase ZEV access for all consumers in California. The Green Commuter model operates vanpool vehicles as public car share and/or fleet replacement vehicles during non-commute hours. This integrated approach reduces costs and increases benefits—improving zero-emission mobility, reducing emissions, and alleviating traffic and parking issues.

Mobility services that maximize occupancy and use of the vehicles are ideally suited for electric vehicle technologies. Utilizing the electric vehicles for multiple forms of mobility services – including vanpooling, car sharing and fleet replacement maximizes efficiency and increases the benefits of zero-emission technology. Zero-emission vanpooling, with the combined car sharing/fleet replacement and necessary supporting EVSE infrastructure, increases awareness and access for more Californians to ride in an electric vehicle and help reach the State's ZEV deployment and air quality goals, including the Governor's ZEV Action Plan, SB 350, SB 1275, and SB 535.

Green Commuter supports the Air Resources Board (ARB) four guiding principles for the Consent Decree Appendix C. Our specific comments include:

- We support the installation of ZEV infrastructure, specifically DC fast-chargers at workplaces and Level 2 chargers at Park and Ride Lots or other vanpool pick-up locations. We respectfully request expanding eligibility to include Level 3 mobile charging stations to allow more EVs to access fast charging and improve zero-emission vehicle scalability. Mobile chargers provide the ability to charge during off-peak periods and utilize the batteries to charge vehicles during peak periods, reducing the strain to the electrical grid and lowering costs.
- We strongly support the inclusion of programs or actions to increase public exposure and/or access to ZEVs without purchase or lease of a vehicle. Specifically, we support zero-emission car share and rideshare services, and respectfully request the inclusion of



It's how we roll.

A zero emission vehicle vanpool  
and car sharing company.

**zero-emission vanpooling** in the guiding principles for Appendix C to include funding for zero-emission vanpooling in all four investment plans over the next ten years which will maximize opportunities for California residents of all economic means to ride and drive a zero-emission vehicle.

- We applaud the inclusion of a Green City to provide key demonstrations of zero-emission car sharing services and respectfully request the inclusion of zero-emission vanpooling in all four investment plans over the next ten years to further ZEV access.

Thank you for the opportunity to provide comments on the VW Consent Decree Appendix C. We look forward to continuing to work together to help carry out the goals and initiatives of increasing public exposure and access to zero-emission vehicles for consumers in California.

Sincerely yours,

Gustavo Occhiuzzo  
CEO

Leslie Graham  
Director of Grants and Partnerships