



Clean Transportation Solutions

December 15, 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. First Priority GreenFleet looks forward to working with ARB and VW to eliminate toxic NOx emissions, reduce greenhouse gas emissions, and provide health and associated benefits throughout the United States.

First Priority GreenFleet is a total solutions provider of sustainable fleets, providing a full range of low- and zero-emission vehicles and infrastructure. First Priority GreenFleet is a division of First Priority Global, which is one of the largest and most reliable providers of specialty commercial fleet vehicles in the United States – with over 15 years of experience in the purpose built vehicle market with deployments in 21 countries and 29 states. Our mission is to revolutionize the industry with a customer-centric service network—continuing the legacy of First Priority's success deploying and servicing specialty commercial fleets and now expanding our core expertise to bi-coastal manufacturing with an extensive service network.

First Priority GreenFleet is committed to deploying, servicing, and manufacturing low- and zero-emission medium- and heavy-duty vehicles. First Priority recently acquired the assets of Electric Vehicles International (EVI), and is very proud to expand manufacturing of EVI's zero-emission medium-duty delivery trucks, as well as the suite of EVI vehicles, at the EVI facility in Stockton, California. In addition, First Priority GreenFleet offers the first zero-emission, purpose-built school buses in North America – eLion (Type C) and Trans Tech/Motiv (Type A) that collectively cover the majority of school bus in California and beyond. First Priority is committed to serving school districts with clean, state-of-the-art school buses that eliminate toxic exposures and improve safety for students.

As part of the VW Investment Appendix C in California, First Priority strongly supports the plan for significant investment to increase ZEV access and infrastructure. First Priority's specific comments include:

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- We support the inclusion of a Green City initiative to fund a transformative project to increase ZEV access. School buses are the largest segment of mass transit in the United States, carrying twice as many passengers as the entire US transit bus and rail segments combined. School buses, however, are among the oldest and dirtiest fleets on the road, and school children are sensitive receptors and face elevated health risk from daily exposure to the toxic air contaminants from diesel emissions. We respectfully request including eligibility for zero-emission school buses to eliminate toxic emission exposures to children, particularly in disadvantaged communities.
- Within the infrastructure investments, we strongly support the inclusion of charging infrastructure for medium- and heavy-duty fleets in order to support and advance the use of ZEVs, and respectfully request including charging stations for fleets that serve the public, such school districts or municipal vehicles, as an eligible use of funding. Support for ZEV infrastructure will help assist cash-strapped schools and increase ZEV adoption.

Thank you for the opportunity to provide comments on Appendix C: Volkswagen's Zero Emission Vehicle Investment Commitment Development Process and Investment Areas. We look forward to continuing to work together to help carry out the goals and initiatives in the ZEV Investment Commitment and Environmental Mitigation Trust.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Alex'.

Alex Cherepakhov
CEO