

July 14, 2017

Mr. Mark Williams, Mailstop 3E  
California Air Resources Board  
P.O. Box 2815  
Sacramento, California 95812

**RE: Comments on Volkswagen's Supplement to the California Investment Plan**

Dear Mr. Williams:

The San Joaquin Valley Air Pollution Control District (District) appreciates the opportunity to comment on the Volkswagen's Supplement to the California ZEV Investment Plan. The District supports the inclusion of the Fresno Metro area as a sixth beachhead for community charging. The addition of the Fresno Metro area is a great first step in bringing much needed electric vehicle (EV) charging infrastructure to the San Joaquin Valley (Valley). The Valley has one of the greatest air quality challenges in the nation and faces substantial socio-economic disadvantages, specifically given that 20 of the top 30 California disadvantaged communities are located in the San Joaquin Valley, according to CalEPA's most current list of designated disadvantaged communities.

The challenges faced by the Valley with respect to air quality are unmatched by any other region in the State. The Valley's topography, climate, geography and the presence of two major transportation corridors connecting Northern and Southern California all contribute to the region's air quality problem. Mobile sources are the leading contributors of air pollution in the Valley. With the assistance of California's ZEV investment plan, we are further promoting EV technologies by providing clean air solutions that will benefit the entire Valley.

Despite the momentum of EV adoption, large investments in EV infrastructure are greatly needed to sustain the proliferation of EV adoption and to meet the Governor's target of 1.5 million EVs on California's roadways by 2025. Multiple corridor gaps and many undeserved communities are in need of EV infrastructure that includes but not limited to workplace, Multi-Unit Dwellings (MUDs), retail locations, municipal lots and garages. A combination of Level 2 and Level 3 EV charging infrastructure would not only reduce the range anxiety many EV owners experience, but it will bring the confidence in the technology and allow for further EV adoption while reducing harmful air pollution that affects our community.

In our continuous efforts to improve air quality, the District collaborated closely with the other California air districts to ensure widespread electric vehicle infrastructure coverage throughout the state. Our proposal would provide electric vehicle infrastructure across 50% of the state, encompassing 63% of all of California's roadways and over 79% of the state's population of the state.

**Seyed Sadredin**

Executive Director/Air Pollution Control Officer

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This continues to be a highly valuable opportunity to leverage local and regional funding in collaboration with VW's investments. However, as of this date, VW has not responded to the District's requests to set up discussions regarding this proposal. This is a great opportunity to work in partnership with other experienced air districts in further evaluating strategies on how to appropriately allocate funds in metropolitan areas that are prioritized in the supplement to the California ZEV Investment plan.

Currently, through its award winning and nationally recognized incentive program the District has invested a significant amount of resources toward the expansion and deployment of clean vehicle technologies in the Valley. The District provides incentive funding for both EVs and EV charging infrastructure that assists the Valley in meeting attainment for federal air quality standards.

The District continues to offer the largest incentives for the purchase of EVs in California. The Drive Clean! Rebate Program provides Valley residents and businesses a rebate for the purchase of a new EV while the Public Benefit Grants Program offers Valley public fleets an incentive to expand their white fleet with EVs. Both of these District programs may be leveraged with the other available incentive programs to reduce the purchase cost of a new EV. The Enhanced Fleet Modernization and Plus-Up Program provides qualifying, low-income Valley residents funding to purchase at a minimal cost, a clean air vehicle by replacing an older high-polluting vehicle .

The deployment of zero-emission and plug-in hybrid electric vehicles throughout the Valley plays a key role in the District's attainment strategy. However, these vehicles are dependent on the number of public electric vehicle charging stations and the funding to install them. The District's Charge Up! Electric Vehicle Charging Program provides funding for electric vehicle infrastructure, however additional funding is needed to address the lack of infrastructure and install greater numbers of charging stations throughout the Valley and the adjacent regions. This provides a critical resource for many communities considered disadvantaged.

The District strongly supports the addition of the Fresno metro area in the supplement to the California ZEV Investment plan and urges the reconsideration of our joint proposal. Should you have any questions, please do not hesitate to contact me at (559) 230-6000.

Sincerely,



(72) Seyed Sadredin

Executive Director/Air Pollution Control Officer