

December 16, 2016

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

RE: California Zero Emission Vehicle Investment Plan

Mr. Williams,

On behalf of the California Transit Association, I would like to thank you for this opportunity to shape the state's guidance to Volkswagen on the California Zero Emission Vehicle Investment Plan. The Association represents more than 200 transit-affiliated entities in California, including transit agencies, original equipment manufacturers, and part suppliers. Taken together, our members provide the vast majority of the 1.44 billion unlinked transit trips taken in California annually, and drive innovation in the heavy-duty vehicle sector that reduces greenhouse gas (GHG) emissions and improves air quality. I write to you today to emphasize the importance of strengthening the role of public transit in the California ZEV Investment Plan.

The California ZEV Investment Plan, proposed by the Appendix C of the Partial Consent Decree, establishes a program for investing \$800 million over ten years in zero emission on-road vehicles, charging infrastructure and brand-neutral education that builds or increases public awareness of ZEVs. The Association appreciates the value of these proposed investments, which aim to address the adverse environmental impacts arising from consumers' purchases of 2.0L Volkswagen vehicles, and supports the proposed "Green City" initiative, which consciously contemplates a role for public transit. However, to better address issues of access to ZEVs across socioeconomic strata and to deliver investments that maximize co-benefits that reduce congestion and create jobs, we believe the ARB should advise Volkswagen to consider the following:

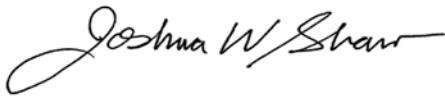
- **Transit Buses** – Californians across the state are transit-dependent for reasons related to health, age, disability and/or socioeconomic status and will be unable to purchase, or otherwise access, ZEVs despite increases in the practicality of these vehicles and/or more advanced education and outreach efforts. To ensure that these residents, who unwittingly share in the negative air quality impacts of non-compliant Volkswagen vehicles, gain access to ZEVs, the Association believes funding earmarked for ZEVs purchases should be used to acquire zero-emission transit buses.
- **Transit Bus Charging Infrastructure** – Appendix C of the Partial Consent Decree proposes implementation of new ZEV charging infrastructure that is available to public entities as well as private individuals. As transit centers often have prohibited access for private vehicles resulting from safety concerns, the California ZEV Investment Plan

should consider also investing in charging infrastructure that exclusively benefits public transit without regard to private vehicle access.

- **Workforce Development and Training** – Workforce Development is an underfunded, and often overlooked component of successful ZEV implementation. The California ZEV Investment Plan should, therefore, consider ongoing investment in workforce development and training to ensure California has the labor force necessary to keep pace with emergent technologies.

Once again, I thank you for this opportunity to provide comments to you on the California ZEV Investment Plan. We look forward to further engaging with the state as it considers investments related to Appendix D of the Partial Consent Decree. If you have any questions, please do not hesitate to reach out to me directly at josh@caltransit.org or at 916-446-4656.

Sincerely,

A handwritten signature in black ink that reads "Joshua W. Shaw". The signature is fluid and cursive, with the first name "Joshua" being the most prominent part.

Joshua W. Shaw
Executive Director

cc: Members and Staff, California Air Resources Board