

July 13, 2017

Mr. Richard W. Corey
Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95812

**Re: Volkswagen's (Electrify America) Supplement to the California ZEV Investment Plan,
Cycle 1**

Dear Mr. Corey:

The City of San Jose has a long-standing history of environmental leadership, including its efforts to accelerate the transition to Zero Emission Vehicles. The City installed its first electric vehicle charging station in 2009, a public demonstration pilot with ChargePoint. Today, the City operates 65 chargers (90 charge points), and has adopted innovative policies and procedures to encourage EV adoption. The San Francisco Bay Area has succeeded in making the region the "electric vehicle capitol of the U.S." on the basis of its electric vehicle take up rate. Twenty-three out of the 30 California cities with the highest rate of new electric vehicle registrations in 2015 were in the Bay Area.

The City has been delighted to see steady growth in the electric vehicle market share in San Jose and the Bay Area specifically, and California generally. However, to meet the needs of this growing market, as well as the potential market in disadvantaged communities, we will need to substantially increase access to electric vehicle charging and ZEVs. The \$800 million infrastructure, education, and outreach investments Electrify America will make in California over the next 10 years, in concert with the investments the state, regional agencies, and public utilities are already making, will substantially promote and expand the use of and access to ZEVs.

We were particularly pleased that Electrify America identified San Jose as one of five metropolitan areas in California prioritized for community charging investment in its first 30-month, \$200 million, investment cycle. Doing so is consistent with the recommendations of the National Academy of Sciences, an organization tasked with providing independent, objective advice to the nation on matters related to science and technology. In its 2015 report, *Overcoming Barriers to Deployment of Plug-In Electric Vehicles*, the Academy recommended a "beachhead" rather than mass market approach as a more effective way to expand the market for Plug-in Electric Vehicles (PEVs). "For the PEV market, a beachhead approach logically would focus on key geographic regions or regional corridors where momentum has already been established; infrastructure is more readily available; word-of-mouth between neighbors, friends, and co-

Mr. Richard W. Corey

July 14, 2017

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

Page 2 of 2

workers can occur more readily; where there is greater availability of PEV makes and models; and where gasoline is expensive or electricity is cheap.” These conditions area all present in the San Jose metropolitan area.

We concur with Electrify America's focus on five investment areas within these metro areas - workplaces, multi-unit dwellings, retail, charging depots and municipal lots and garages—and the reasons it gave for doing so in its Supplement to the California ZEV Investment Plan (Supplement). We also appreciated the additional detail Electrify America provided in the Supplement for how it plans to target the unique barriers to ZEV use in low-income and disadvantaged communities. This is of prime interest to San Jose given that 7% of the City's 198 census tracts are categorized as “disadvantaged” according to CalEnviroScreen 3.0.

In particular, we noted that Electrify America plans to, among other things:

1. Commit \$2-3 million to an education and awareness campaign that would include partnering with entities with access to and credibility within low-income and disadvantaged communities.
2. Explore partnerships that would increase access to pre-owned ZEVs to moderate and low-income Californians.
3. Actively participate in efforts initiated by CARB to better understand market barriers to entry to low and moderate income Californians and means to overcome those barriers.

Lastly, we appreciate Electrify America's efforts to coordinate with others, such as the ZEV charging industry, utilities, and CARB, to maximize its investments for the greatest overall impact and to measure and report out on its progress and impact at regular intervals.

In summary, we urge the California Air Resources Board to approve Electrify America's Cycle 1 CA ZEV Investment Plan, including its June 29, 2017 Supplement, and allow it to begin implementing that plan.

Sincerely,



Kevin O'Connor

Assistant Director of Transportation