

July 14, 2017

Chairman Mary Nichols
California Air Resources Board
1001 I Street
Sacramento, CA 95814

**RE: Electrify America Supplement to the Proposed California ZEV Investment Plan:
Cycle 1**

Dear Chair Nichols and Members of the Board:

The deception by Volkswagen to intentionally avoid compliance with clean air laws is an unprecedented action by a company to undermine clean car standards. The settlement agreements are a critical part of repairing the damage to California's public health and air quality.

Electrify America's initial proposed Cycle 1 California ZEV Investment Plan detailed several important actions that would improve the ability for Californians to replace conventional light-duty vehicles with zero emission vehicles, lowering air pollution and emissions in California. However, the original plan was deficient in several areas.

Our primary concerns with the initial proposal were the lack of commitment to disadvantaged communities, the lack of investment in San Joaquin Valley metro areas, and the absence of support for hydrogen fuel cell electric vehicle refueling infrastructure and consumer awareness activities.

We thank Electrify America for their thorough response to the Air Resources Board's request for supplemental information on the California ZEV Investment Plan. The supplemental information clarifies that Electrify America projects greater than 35 percent of ZEV investments will benefit disadvantaged or low-income communities. The supplement also adds Fresno to the community charging investment, which will help bring access to electric vehicles to the San Joaquin Valley. However, the supplement does not include any support for hydrogen infrastructure, despite projections of over 90 percent station utilization based on anticipated 2020 hydrogen fuel supply and vehicle

demand. Also, the “Brand-Neutral Public Education and Outreach Activities” still focuses on plug-in electric vehicles as the partnerships that are being considered are with outside groups dedicated to plug-in vehicle technologies. Electrify America should be prepared to include hydrogen fuel cell infrastructure in future investment plans and to include fuel cell vehicles in education and awareness activities during the Cycle 1 activities. Support for the deployment of both fuel cell and plug-in electric vehicles is important for providing California consumers with the greatest number of choices in zero-emission vehicle options.

The Union of Concerned Scientists thanks the board and Electrify America for moving quickly to propose and amend the ZEV Investment Plan for the first installment of funds. While it is important to ensure the investments are made with significant oversight from the Board, it is also critical to invest without delay in infrastructure, education, and awareness efforts to accelerate the market for ZEVs.

Sincerely,

A handwritten signature in black ink that reads "David Reichmuth". The signature is written in a cursive, flowing style.

David Reichmuth
Senior Engineer
Clean Vehicles Program
Union of Concerned Scientists