



May 11, 2018

Chair Nichols & Members of the Board  
California Air Resources Board  
1001 "I" Street  
Sacramento, CA 95812

**Re: Support for Zero Emission Investments in Volkswagen (VW) Settlement Proposal**

Dear Chair Nichols and Members of the Board:

On behalf of the Center for Community Action and Environmental Justice (CCA EJ), East Yard Communities for Environmental Justice (EYCEJ), and Earthjustice, we provide comments on the Board's proposed investment plan for the VW settlement. As our organizations have made clear time and time again, the communities we work with in the South Coast Air Basin impacted by ports, railyards, freight highways, and warehouses have been pushing for zero emissions technologies and moving away from combustion vehicles. Thus, we support activities by the agency – regulations, investment of settlement dollars for air pollution infractions, etc. – that move to zero emissions operations, particularly in communities impacted by freight pollution.

As such, we really appreciate the focus on investments in zero-emission transit, school, shuttle buses, class 8 freight, port drayage trucks, forklifts, port cargo equipment, marine vessels, ferries, and tugboats in the VW proposal. These investments will pay huge dividends in catalyzing a zero emissions freight future for our primary freight network in California. Much of the equipment targeted are the precise sources of pollution that continue to bombard communities with air pollution. We hope that these zero emissions projects will be targeted in disadvantaged communities like the harbor area of LA/Long Beach, railyards in the South Coast Air Basin, and the Inland Valley warehouses.

Finally, we appreciate the California Air Resources Board working closely with utilities like Southern California Edison and Los Angeles Department of Water & Power, in addition to regulatory agencies like the California Public Utilities Commission and the California Energy Commission, to make sure they understand that "heavy-duty zero-emission vehicle infrastructure

is under-funded and demand is high.”<sup>1</sup> Our organizations have been working to push these utilities and agencies to understand the scope of the challenge of the necessary shift to a zero emissions future to achieve real environmental justice. We hope the California Air Resources Board will continue to work with all these entities to provide the requisite charging infrastructure for large vehicles. The more the utilities can handle the electrical charging infrastructure, the more funds like those for the VW settlement can be stretched for actual deployment of vehicles.

We appreciate the work of the California Air Resources Board to advance zero emission projects in communities impacted by freight. Please do not hesitate to contact us if you have question.

Sincerely,

Michele Hasson  
Center for Community Action and Environmental Justice

Taylor Thomas  
East Yard Communities for Environmental Justice

Adrian Martinez  
Erica Martinez  
Earthjustice

cc: Richard Corey, Executive Officer  
Veronica Eady, Assistant Executive Officer for Environmental Justice

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<sup>1</sup> California Air Resources Board, Proposed Beneficiary Mitigation Program for the Volkswagen Environmental Mitigation Trust, at p. 16 (April 20, 2018).