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Chair

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San Joaquin Valley Air
Pollution Control District

SJV Clean Cities Coalition

SJV Clean Energy
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Umbrella Management

Project Clean Air

TIN: 33-0472571

Brenda Turner

Courtney Velasco

California Air Resources Board
Chair Mary Nichols and Board

July 14, 2017

Re: Supplement Plan to the California ZEV Investment Plan as submitted by Electrify America

Chair Nichols and Board,

The San Joaquin Valley Electric Vehicle Partnership (SJVEVP) submitted comments on the California ZEV Investment Plan: Cycle 1 to your Board in April 2017. Since that time, the SJVEVP and some of our stakeholders have had conversations with Electrify America and we have read the Supplemental Plan submitted to CARB in June 2017.

We write today to express support for the Supplement Plan to the California ZEV Investment Plan Cycle 1 (Supplement). The Supplement provides significantly more information with regard to decision-making metrics for Cycle 1 and future cycles. The Supplement does not provide everything we or others requested. It does open the door to partnerships and dialog for this and future ZEV investments made by Volkswagen through Electrify America. We appreciate that Electrify America has demonstrated flexibility in its planning to include the Fresno Metro Area (5.1). It is important to note we expect there will be significant electric vehicle market development impacts to other regions of the Central Valley. With an investment expected to rise above \$1 Million, it will provide a solid base from which we can grow the market. We also appreciate the outreach begun with Central Valley environmental justice organizations and air quality advocates. The Supplement states that activities will be carried out in disadvantaged communities or low-income areas and in a language other than English where appropriate. (4.4)

We agree with Electrify America's approach of using analytics to identify census tracts for new charging station installations.

We hope that Electrify America will sponsor or support local groups that host EV and charging station deployment efforts, including conferences, ride and drives, outreach to the EV sales force across all brands and other outreach or workforce training activities. Combined with the best EV incentives in the Nation, this would amplify the impact of investments.

We suggest that the US DOE Clean Cities Coalitions throughout California be added to the list of partnerships (6.1) as Electrify America moves forward with implementing the ZEV Investment Plan and Supplement.

We suggest that as Electrify America works with Caltrans, they both follow the goals of the FAST Corridor program, especially in placing signs along State Routes to indicate the locations of EV Charging Stations.

With regards to on-going maintenance (8.5) we recommend installing more than one charging station in each location (or nearby) to serve as backups, in the event that a station will be "down" for 48-72 hours as well as making sure that local service contractors keep an inventory of parts to reduce repair times (this is key in the Central Valley, where travel to Southern California may be disrupted by weather in the Winter months).

The SJVEVP expresses its appreciation to the California Air Resources Board and staff for the communication with the public and the guidance provided to Volkswagen.

Sincerely,

Bill Williams

San Joaquin Valley EV Partnership
Chair, Bill Williams, Proterra



San Joaquin Valley
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