

  
**California New Car Dealers Association**

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Mr. Mark Williams  
Air Pollution Specialist  
California Air Resources Board  
101 I Street, P.O. Box 2815  
Sacramento, CA 95812

RE: VOLKSWAGEN ZEV INVESTMENT PLAN

Dear Mr. Williams,

The California New Car Dealers Association (CNCDA) is a statewide trade association that represents the interests of over 1,100 franchised new car and truck dealer members. CNCDA members are primarily engaged in the retail sale and lease of new and used motor vehicles, but also provide customers with parts, service, and automotive repair. Our member dealers are actively involved in the communities they serve, and are committed to supporting their customers. Thank you for the opportunity to provide written comments on the California Air Resources Board (ARB) Advanced Clean Cars Midterm Review.

California's new car dealers support the ZEV investments Volkswagen is proposing, especially the focus on building infrastructure and cultivating customer demand. A robust consumer education plan is vital for widespread ZEV adoption, and our state's dealers are looking forward to assisting VW with implementation any way that we can.

We would encourage VW, as part of its commercial/retail infrastructure proposal, to consider locating some public charging stations at our state's dealerships. Auto malls, and even stand-alone stores, see hundreds of customers come through their lots every day, and providing customers an opportunity to charge their vehicles while on the go or while on a test drive for a new ZEV would go a long way towards increasing consumer adoption.

While we support the majority of VW's plan, we are extremely discouraged to see that the plan is not technology-neutral, which was one of ARB's requirements. In addition to all of the battery electric and hybrid vehicles available for purchase, many of our state's dealers also have fuel cell electric vehicles on their lots -- vehicles that, although they are gorgeous, powerful, and clean, can be very difficult to sell due to the lack of public fueling opportunities for miles on end. We request that VW and ARB consider modifying the plan to take into account infrastructure needs for fuel cell vehicles. As you know, hydrogen fueling stations are extremely expensive to build, and this settlement plan is a perfect opportunity to encourage this nascent market.

Thank you for considering our comments on VW's proposed settlement plan. We look forward to continuing to work with ARB and doing all that we can to support our state's ZEV market. Please contact me at [areinhardt@cncda.org](mailto:areinhardt@cncda.org) or 916-441-2599 if you would like to discuss these comments further.

Sincerely,



Alisa Reinhardt  
CNCDA Director of Regulatory Affairs