

October 26, 2018

Sent Via Email

Mr. Mark Williams, Mailstop 3E  
California Air Resources Board  
P.O. Box 2815  
Sacramento, California 95812

**RE: Electrify America's California Zero Emission Vehicle (ZEV) Cycle 2 Investment Plan**

On behalf of the Central Valley Air Quality Coalition (CVAQ), we thank the Air Resources Board (ARB) for the opportunity to comment on Electrify America's Cycle 2 Investment Plan.

CVAQ is a partnership of more than 60 community based organizations throughout the San Joaquin Valley and state, unified in our commitment to create clean air for the San Joaquin Valley through policy change.

Based on public feedback and lessons learned from cycle 1, this plan represents a marked improvement. We appreciate Electrify America's cycle 2 commitment to work with community based organizations to ensure meaningful engagement of disadvantaged communities and to address barriers for ZEV adoption in low-income and disadvantaged communities. We appreciate Electrify America's willingness to work with, and respond to the concerns of, community groups in the San Joaquin Valley.

In order to better serve California's disadvantaged populations, provide local air quality benefits, and further accelerate the adoption of much needed zero-emission technology, we recommend Electrify America:

1. Commit to a 35% investment in disadvantaged and low-income communities *in each region* targeted to ensure equitable investment within each metropolitan area. The cycle 2 plan proposes 35% in overall investments in low-income or disadvantaged communities. We also recommend that a significant proportion of the investment committed to disadvantaged communities within Fresno County is directly located in the the top 5% of census tracts as determined by EPA's CalEnviro screening tool.
2. Produce a map of the census tracts targeted for investment in the state. Without revealing any proprietary information, a census-tract level map of targeted investment areas,

overlaid with the CalEnviroScreen map, could offer the public valuable evidence of Electrify America's commitment to disadvantaged communities. As we move forward with cycle 2, the Fresno charging locations in cycle 1 have not been identified or made public, making it difficult to provide guidance on Electrify America's commitment to disadvantaged communities.

3. Sustain infrastructure commitments in disadvantaged communities. We appreciate Electrify America's willingness to address fueling barriers for low-income residents. Recognizing the most convenient fueling option is residential charging, we support the plan's approach to create an online tool to connect low-income residents to resources for purchasing and installing home chargers. In addition, we recommend Electrify America include resources for low-cost residential solar programs and include all resources in printed materials to be disseminated by community based organizations.
4. Ensure outreach efforts in disadvantaged communities is led by community groups. We applaud Electrify America's \$2-3 million allocation to support community based organizations providing EV outreach. We also encourage Electrify America ensure community groups take a lead role in developing appropriate outreach materials tailored for specific communities and in planning Discover & Drive events, including site location and timing.
5. Work with local jurisdictions to expedite investment timelines. We agree with Electrify America, state agencies play a critical role in ensuring local jurisdictions abide by AB 1236 and expedite permitting for EV charging stations. To that end, we encourage Electrify America to work creatively with local jurisdiction staff, elected officials and advisory committees to expedite the process.

In sum, we appreciate the improvements in the cycle 2 plan and the willingness and commitment of Electrify America to work with all stakeholders and community groups in the state. We will continue to engage with Electrify America to ensure this plan and future investment cycles closely align with the needs of disadvantaged and overburdened communities in the Valley.

Sincerely,

*Dolores Barajas-Weller*

**Central Valley Air Quality (CVAQ) Coalition**