



April 10, 2017

Mary Nichols
Chair
and Board Members
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Submitted electronically via:
https://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=vwzevinvestplanws&comm_period=1

RE: Volkswagen California ZEV Investment Plan: Cycle 1

Dear Chair Nichols and Board Members:

We are writing to express three concerns about the VW ZEV Investment Plan: Cycle I.

First, we share concerns raised in the letter of April 10 by Union of Concerned Scientists about the investment plan's commitment to serving disadvantaged communities. As that letter notes, the plan is "vague on the proposed locations of charging infrastructure investments, but appears to call out highway DC fast chargers as the primary means to place charging in disadvantaged communities", which technically places chargers in disadvantaged communities without actually designing the infrastructure to serve those living near chargers. We urge CARB to press VW to rethink its infrastructure proposal to include more investments in community-based charging in disadvantaged communities.

Second, we share UCS's concern that the San Joaquin Valley is not included in the investment plan. That region is one of the most polluted in the country and, as with the rest of the state, a substantial portion of that pollution is attributable to mobile sources. Increasing exposure to and infrastructure for ZEVs and ZEBs in the region is essential to cutting pollution there. We urge the CARB to press VW to expand its vision of regions included in the plan to include the San Joaquin Valley.

Finally, as the IBEW noted in its letter to CARB on this matter earlier this month, the VW investment plan doesn't indicate how VW will make sure qualified electrical personnel and contractors install and maintain the ZEV infrastructure. Additionally, the plan does not indicate any effort to leverage existing apprenticeship programs to ensure the investment aligns with state goals to create pathways to training and middle-class jobs as the state transitions to zero-emission technologies. We urge CARB to press VW to overtly establish responsible contractor

criteria for companies that will install and maintain the infrastructure. We also urge CARB to press VW to include recruitment and training criteria that will ensure that the investments contribute to pathways to good jobs, particularly in disadvantaged communities.

Thank you for considering these comments.

Sincerely,

A handwritten signature in blue ink that reads "Kathryn Phillips". The signature is written in a cursive style with a large initial 'K' and a long, sweeping underline.

Kathryn Phillips
Director