

April 10, 2017

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

RE: Comments on Volkswagen's first Proposed 30-Month Zero Emission Vehicle (ZEV) Investment Plan

Dear Mr. Williams:

The San Joaquin Valley Air Pollution Control District (District) appreciates the opportunity to comment on Volkswagen's first Proposed 30-Month Zero Emission Vehicle (ZEV) Investment Plan. The original intent of the Volkswagen Consent Decree was, in large part, to provide funding for the installation of zero-emission vehicle fueling infrastructure, and investment in projects such as car-sharing programs that will increase access to ZEVs for all consumers in California, particularly those in lower-income and disadvantaged communities. As you are well aware, the San Joaquin Valley has one of the most significant air quality challenges in the nation and faces substantial socio-economic disadvantages, especially given that 23 of the top 30 California disadvantaged communities are located in the San Joaquin Valley. The current ZEV Investment Plan, as proposed, has identified five metropolitan areas for community charging investment, none of which are in the San Joaquin Valley, one of the largest geographic areas in California. While the San Joaquin Valley has traditionally lagged behind other areas of the state in electric vehicle adoption rates, particularly the more affluent coastal areas, the Valley has made great strides in electric vehicle adoption and would benefit greatly with significant community EV charging infrastructure investment. Not funding additional electric vehicle infrastructure in the Valley is really a missed opportunity. As the number of electric vehicles in the Valley continues to increase at a significant rate, the need for infrastructure is also increasing and additional electric vehicle infrastructure is paramount for expanded growth in a traditionally underserved region.

Recently, the District collaborated closely with several other large California air districts on a broad, aggressive and multi-faceted proposal to ensure contiguous electric vehicle infrastructure coverage throughout the majority of California. The comprehensive, multi-regional plan that was submitted would provide consistent electric vehicle infrastructure across 50% of the state, encompassing 63% of all of California's roadways and over 79% of the state's population.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

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This contiguous coverage is essential to expanded electric vehicle growth throughout the state and will ultimately benefit the state as a whole as well as the San Joaquin Valley.

The Valley's topography, climate, geography and the presence of two major transportation corridors connecting Northern and Southern California all contribute to the region's air quality problem. Mobile sources are the leading contributors of air pollution in the Valley and to assist with meeting attainment of federal air quality standards, the District has focused significant resources toward the advancement and deployment of clean vehicle technologies and the fueling infrastructure to support electric vehicle deployment. In fact, the Valley currently has the most aggressive incentives for electric vehicles in the state, both for new vehicles through the Drive Clean! Rebate Program that can be combined with the statewide Clean Vehicle Rebate Program as well as for the replacement of high-polluting vehicles through the Enhanced Fleet Modernization Program (EFMP) and EFMP Plus-Up. This has led to the largest year-over-year percentage increase in electric vehicle adoption of the five major air districts in California since 2011.

The deployment of zero-emission vehicles throughout the Valley plays an important role in the District's attainment strategy. Battery electric and plug-in hybrid electric vehicles, however, are dependent on the number of public electric vehicle charging stations and the funding to install them. The District's Charge Up! Electric Vehicle Charging Program provides funding for electric vehicle infrastructure, however additional funding is needed to address the lack of infrastructure in the Valley to install greater numbers of charging stations throughout the Valley and the adjacent regions and provide a critical resource, particularly in disadvantaged communities.

For these reasons, the District strongly urges the inclusion of metropolitan areas within the San Joaquin Valley in the Community Charging portion of Volkswagen's first 30-month ZEV Investment Plan. Should you have any questions, please do not hesitate to contact me at (559) 230-6000.

Sincerely,



Seyed Sadredin

Executive Director/Air Pollution Control Officer

cc: Mary Nichols, Chair
California Air Resources Board

Richard Corey, Executive Officer
California Air Resources Board