



LA County Chief Sustainability Office
Environment • Economy • Equity



LOS ANGELES COUNTY
ECONOMIC DEVELOPMENT CORPORATION
Advancing Opportunity and Prosperity for All



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LOS ANGELES AREA
CHAMBER OF COMMERCE

October 26, 2018

Chairman Mary Nichols
California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: Comments on CA Electrify America Cycle 2 Investment Plan

Dear Chairman Nichols:

On behalf of LA n Sync at the California Community Foundation and our partners – the County of Los Angeles, the City of Los Angeles, FAST, the Los Angeles County Economic Development Corporation, the Southern California Association of Governments, LA Metro, the Los Angeles Chamber of Commerce, and the Los Angeles Cleantech Incubator – we congratulate Electrify America on its release of the Cycle 2 plan and give our support for the plan as currently drafted. We recognize the amount of time, effort, and coordination which has been invested into the development of this plan. We also express our sincere gratitude for all Electrify America has done to recognize Los Angeles as a key market for electric vehicles – both current and future. And of course, we greatly appreciate the time the Electrify America team took to meet with our stakeholders during the planning process and the time that the California Air Resources Board (CARB) spent to take concrete actions in response to comments our region made regarding the Cycle 1 and Cycle 2 plans. We are thrilled to see such a comprehensive plan that truly supports Los Angeles and the development of the electric vehicle market.

To maximize impact, we submit the below comments for Electrify America and CARB to consider when rolling out these programs.

- 1. Resource disadvantaged communities in Los Angeles County.** Los Angeles County is home to over 50% of the state's top 25% of disadvantaged communities as ranked by CalEnviroScreen 3.0, and over 60% of the state's top 10% of disadvantaged communities. In all, over 4 million people in Los Angeles County live within a disadvantaged community. The plan specifically mentions three other regions with a high share of their population with disadvantaged communities, and we want to reiterate that Los Angeles has a significant concentration of disadvantaged communities and is also a key market for electrification. Electrify America should consider both the total population and the share of disadvantaged communities within a region when evaluating which disadvantaged communities to invest limited dollars in.
- 2. Partner the residential programs with existing localized programs such as South Coast's Replace Your Ride to maximize funding distribution.** The South Coast Air Quality Management District offers up to \$9,500 (and sometimes more) to replace and scrap old, polluting gasoline vehicles with new lower-emission cars, such as hybrid and battery electric vehicles in disadvantaged communities. Pairing the Electrify America residential charger program with existing programs like this will allow the investments to achieve higher utilization rates.
- 3. Focus funding for shuttle and bus charging in Los Angeles given our strong commitment to electrification, leveraging efforts that have already been undertaken and maximizing immediate impact.** Together with CARB, LA County, the City and other

regional actors, the Los Angeles Cleantech Incubator has launched the Transportation Electrification Partnership which highlights the region's coordinated effort to rapidly accelerate the market for zero-emission shuttle and bus vehicles. The region has other significant examples of emerging and ongoing efforts. LA Metro is committed to becoming zero emission by 2030 and last year alone deployed 105 electric buses. The agency plans to replace its entire fleet of 2,400 buses by 2030. They are also deploying and considering innovative microtransit projects, for which a proposal was submitted under Cycle 2. Los Angeles DOT is committed to 100% electrification of its 350-bus fleet by 2030. Foothill Transit, operating throughout central Los Angeles and the San Gabriel Valley, has one of the largest EV bus fleets in the nation, logging over 1.5 million electric miles on 30 buses. Similarly, Foothill Transit is also committed to a full BEV fleet by 2030. Long Beach Transit has rolled out their first 10 electric buses and plans to add on an additional 89 more by 2021. Antelope Valley Transit Authority is on pace to become the nation's first entirely zero-emission bus fleet by the end of this year.

4. **Electrify America select Los Angeles Metropolitan area among the metros proposed for Cycle 2 for investment in shared mobility targeted infrastructure.** Los Angeles has the opportunity to provide complementary paratransit service, such as that which is already provided by Access Services.
5. **Locate at least one autonomous vehicle charging centers in the Los Angeles region.** Given the size of the LA metro area, its reliance on automobiles, and its heavy influence in the electric vehicle market, it is critical for market development to locate at least one autonomous vehicle charging station here. It is vital to our collective goals that autonomous vehicles be zero emission and shared, and the Transportation Electrification Partnership is working to achieve these goals and other aggressive goals in the lead up to the 2028 Olympics.
6. **Recognize and work with existing utility and state program designs for the one-stop center.** We appreciate EA's effort to bring a more customer-centric approach by proposing a one-stop center. Millions of dollars in public and ratepayer investment have been poured into developing incentives for vehicles and charging stations through individual utilities, municipalities, air districts, and other state agencies. It's important to recognize that while a one-stop location for virtual purchases makes sense, these agencies do not want to abandon their investments and the reputation for excellence that has been built up within these. We encourage Electrify America to develop a site in a way that enhances these existing capabilities and efforts instead of duplicating or drawing attention from them. We look forward to working on technological, branding, or other options to elevate all the work while generating more EV drivers as new customers.

Thank you in advance for your consideration of these comments. We look forward to continuing to engage with you throughout the plan's program development and implementation. Please do not hesitate to reach out to LA n Sync's Program Officer, Ellah Ronen, at eronen@calfund.org as you move through this process.

Sincerely,



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