



July 14, 2017

The Honorable Mary Nichols  
Chair, California Air Resources Board  
1001 I Street Sacramento, CA 95814

**RE: VW'S SUPPLEMENT TO FIRST 30-MONTH ZEV INVESTMENT PLAN**

Dear Air Resources Board Members and Staff,

On behalf of the Central Valley Air Quality Coalition (CVAQ) and the undersigned organizations, we thank the Air Resources Board (ARB) for requesting supplemental information from Electrify America with respect to the proposed Cycle One California ZEV Investment Plan. We appreciate the opportunity to comment on the Supplement.

The Supplement represents a marked improvement over the initial ZEV Investment Plan. Welcomed additions include the selection of Fresno County as a site for community charging investment, intentions to improve public access to the charging network for used car owners, a tailored media campaign specific to the state of California, and focused outreach in disadvantaged communities. We believe these changes will better serve California's disadvantaged populations, provide local air quality benefits, drive demand, and further accelerate the adoption of much needed zero-emission technology. We also appreciate Electrify America's willingness to work with, and respond to the concerns of, community groups in the San Joaquin Valley.

Moving forward, we would like to highlight opportunities for improvement during the approval and implementation of cycle 1 and cycles thereafter. We recommend Electrify America:

- 1) 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.

- 2) Commit to a 35% investment in disadvantaged communities *in each region* targeted to ensure equitable investment within each metropolitan area. 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.

In sum, we appreciate both the changes made to the 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**

*Nayamin Martinez*

**Central California Environmental Justice Network**

*Veronica Garibay*

**Leadership Counsel for Justice and Accountability**