



April 10, 2017

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

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

Dear Chair Nichols and Honorable Board Members,

We greatly appreciate the opportunity to provide input on Volkswagen's (VW) first 30-month Zero Emission Vehicle (ZEV) Investment Plan (Plan *or* The Plan).

The undersigned organizations represent disadvantaged communities in the San Joaquin and Eastern Coachella Valleys. These areas are host to record-high levels of air and water contamination and residents particularly vulnerable to, and with the least tools to combat, environmental pollution. Historically these areas have been ignored by public and private investment and remain far behind their west-coast neighbors in access to green space, electric vehicle (EV) infrastructure, climate investments, and clean air.

We feel strongly that VW's first investment plan fails to benefit communities most in need. The California Air Resources Board's (CARB) guidance states that VW's investments have "tremendous potential to bring the benefits of ZEVs to greater numbers of low-income Californians" and should thus "prioritize projects, especially those that serve disadvantaged, low-income, or disproportionately impacted communities." However, the Plan does not focus investment in areas most overburdened by pollution nor does it provide guidance as to how VW will increase the accessibility of clean energy vehicles to underserved communities. Instead, VW's Guiding Principles focus on locations where "utilization is expected to be high for ZEV drivers," perpetuating the ZEV market's prominence in certain urban regions of California. We

feel this plan maintains the historic inequity low-income communities of color face and recommend the California Air Resources Board not approve the Plan until it meaningfully addresses how it will increase EV access in underserved and overburdened areas.

To demonstrate the disparity in current levels of EV charging investment in the state, please refer to the following maps. ¹ VW’s current plan will add EV chargers in the cities of San Francisco, San Jose and Sacramento (See Figure 1) as well as in Los Angeles (See Figure 2) and San Diego. Except for chargers alongside Highway 99, no charging equipment will be placed directly in central and southern Valley communities (See Figure 3). None are scheduled for the Coachella Valley (See Figure 4).

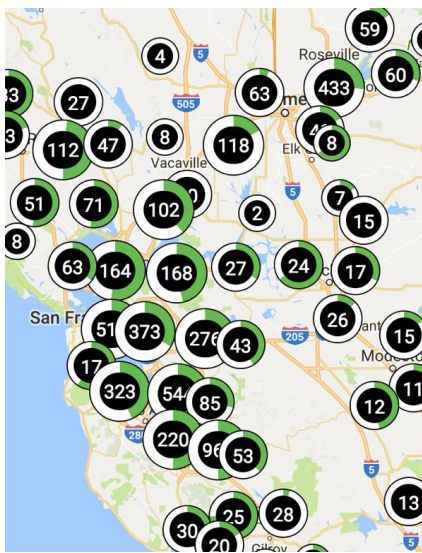


Figure 1: EV Chargers in the Sacramento-Bay Area

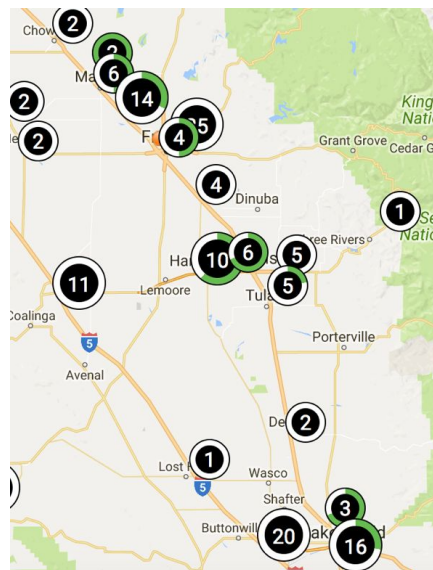


Figure 3: EV Charges in the Central and Southern San Joaquin Valley

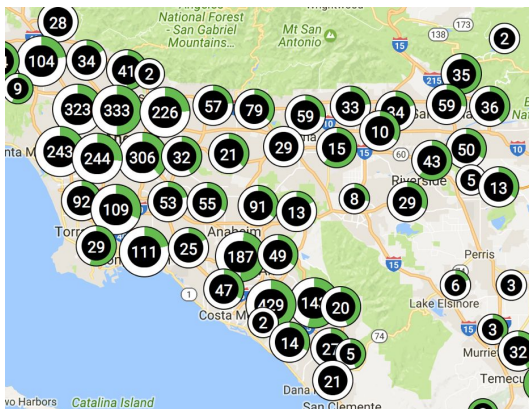


Figure 2: EV Chargers in the Los Angeles

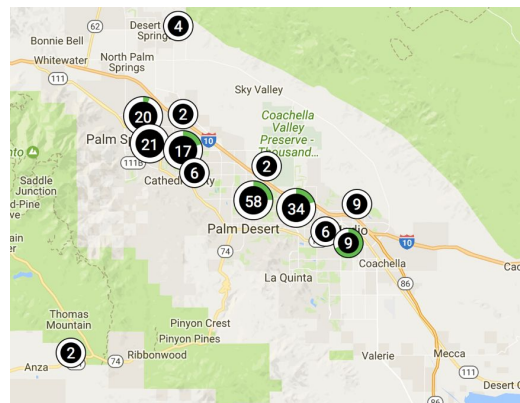


Figure 4: EV Charges in the Coachella Valley

¹ Maps are collected from www.chargepoint.com and may not include all EV stations.

The above maps suggest that (1) there is strong need for increased investment in disadvantaged communities, and (2) natural forces are already incentivizing the placement of EV chargers in areas VW plans to target. This indicates that VW, instead of fulfilling its obligation to invest in disadvantaged communities, is rather attempting to build-out a competitive market in communities with pre-existing investment.

For an additional illustration, the city of Fresno and the city of Sacramento have roughly the same population, about 500,000 residents. However, downtown Fresno has just four chargers and downtown Sacramento has 250. VW plans to supplement Sacramento’s charging system but not Fresno’s, even though Fresno is the second-most polluted city in the nation for fine particulate matter and therefore particularly hard hit from the noncompliant VW engines.

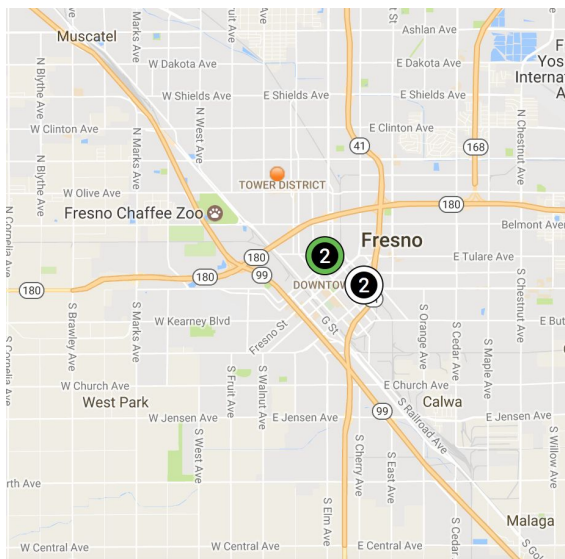


Figure 5: EV chargers in Downtown Fresno and surrounding communities

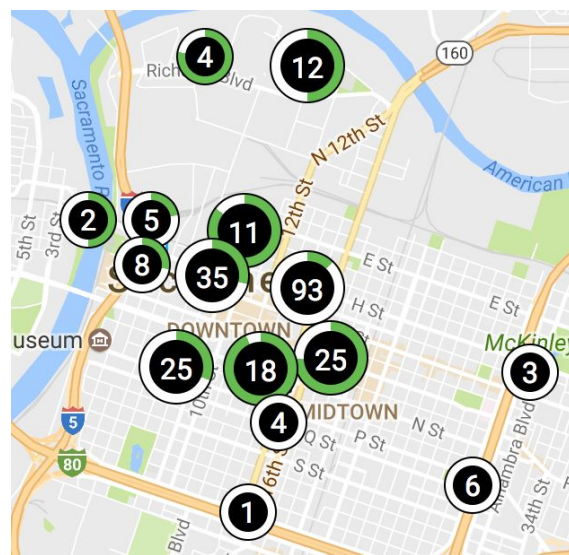


Figure 6: EV chargers in Downtown Sacramento

The settlement brokered between the state of California and Volkswagen offered an historic opportunity for investment in communities thus far neglected by private capital. It is also an opportunity for California to help clean-up air basins in nonattainment of federal health-based standards, a challenge desperately in need of funds. **We recommend that the California Air Resources Board not approve VW’s Investment Plan until it meaningfully addresses how it will increase EV access directly in underserved and overburdened areas.**

We offer the following recommendations:

- (1) VW should include strong evaluation metrics for each cycle to inform future investment cycles;

- (2) The Plan should include a description on how each of its investment categories will benefit low-income, disadvantaged and overburdened communities and how they will increase ZEV access in these communities;
- (3) We recommend the Green City Initiative include a provision or set-aside for rural communities to ensure that folks living in the rural areas of the San Joaquin and Eastern Coachella Valleys may access this technology;
- (4) We recommend VW work with relevant community-based organizations to develop multi-lingual and culturally sensitive outreach materials and to conduct outreach and education in disadvantaged communities;
- (5) We recommend the re-prioritization of VW's Investment Selection Methodology to include a measure of public health;
- (6) CARB should require a community participation component before projects are developed to ensure prioritization of the communities most impacted by pollution. The formalization of an advisory council for this purpose is suggested; and
- (7) The Plan should place EV charging infrastructure in and near apartment complexes, grocery stores, shopping centers, workplaces and community centers in disadvantaged communities, in addition to highway charging.

Thank you,

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

Thomas Helme
Valley Improvement Projects (VIP)

Nikita Daryanani
**Leadership Counsel for Justice and
Accountability**

Nayamin Martinez
**Central California Environmental Justice
Network (CCEJN)**