April 10, 2017

California Air Resources Board

1001 I Street

Sacramento, CA 95815

Re: Volkswagen’s Zero Emission Vehicle Investment Plan

Dear California Air Resources Board Members and Staff,

We appreciate the opportunity to provide comments on Volkswagen’s first Zero Emission Vehicle Investment Plan. First Priority GreenFleet strongly supports investment in zero emission infrastructure, mobility options, and awareness in order to mitigate toxic NOx and greenhouse gas emissions and provide health and associated benefits throughout California.

First Priority GreenFleet is a total solutions provider of sustainable fleets, providing a full range of ultra-low- and zero-emission vehicles and infrastructure. First Priority GreenFleet is a division of First Priority Global, which is one of the largest and most reliable providers of specialty commercial fleet vehicles in the United States – with over 15 years of experience in the purpose built vehicle market with deployments in 21 countries and 29 states. Our mission is to revolutionize the industry with a customer-centric service network—continuing the legacy of First Priority’s success deploying and servicing specialty commercial fleets and now expanding our core expertise to bi-coastal manufacturing with an extensive service network.

First Priority GreenFleet is committed to deploying, servicing, and manufacturing low-, ultra-low-, and zero-emission medium- and heavy-duty vehicles. First Priority recently acquired the assets of Electric Vehicles International (EVI), and is very proud to expand manufacturing of EVI’s zero-emission medium-duty delivery trucks, as well as the suite of EVI vehicles, at the EVI facility in Stockton, California.

First Priority GreenFleet strongly supports the investment in a Green City Initiative in Sacramento, including support for ZEV delivery fleets and shuttle services, to help create a green mobility habitat and showcase a self-sustainable and scalable program that can be replicated in other cities. Short-haul delivery services are a natural sector for electrification, as most delivery fleets operate on reliable routes and hours of operation and ZEV shuttle services offer an opportunity for more consumers to access zero emission transit options. As part or First Priority GreenFleet’s development of All-Electric Zero-Emission Vehicle platforms, the further introduction of shuttle bus service vehicles for paratransit, mobility, airport and hotel shuttles, and short-haul community routes, represent a key focus for the First Priority’s Green City Initiative. Our goal is to continue to work with our zero-emission powertrain and infrastructure support partners to provide a full-suite of shuttle bus, school bus, and medium- and heavy-duty all-electric trucks that, along with our suite of one-stop shop electrification resources, can easily be replicated in other cities and regions for their respective transit operations. We applaud and look forward to supporting and helping to deliver upon the goals of the Green City Initiative in Sacramento, and throughout California.

Sincerely,



Alex Cherepakhov

Chairman & CEO