



**METROPOLITAN
TRANSPORTATION
COMMISSION**

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December 16, 2016

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Ms. Analisa Bevan, Assistant Division Chief
Emissions Compliance, Automotive Regulations & Science Division
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Volkswagen California ZEV Investment Commitment

Dear Ms. Bevan:

The Metropolitan Transportation Commission (MTC) appreciates the opportunity to provide comments on the Air Resources Board's principles and priorities for the Volkswagen California Zero Emission Vehicle Investment (ZEV) Commitment. MTC is the transportation planning, financing and coordinating agency for the nine-county San Francisco Bay Area. MTC believes that the Volkswagen commitment represents a major opportunity to accelerate the implementation of zero-emission vehicles in California and help the state meet its greenhouse gas emission reduction goals, and appreciates the Air Resources Board's leadership in implementing the settlement.

MTC is generally supportive of ARB's Initial Guiding Principles and priorities for Volkswagen's ZEV investments, as presented at the public workshop on December 2, 2016. ARB's priorities are consistent with and supportive of several GHG emission reduction strategies included in MTC's Climate Initiatives Program, such as:

- Incentives to deploy and expand the use of electric vehicles in the region;
- Expansion of the regional EV charger network;
- Investments in ZEV infrastructure, such as the DC fast charge stations and solutions for multi-unit dwellings;
- EV public awareness campaigns.

These strategies are critical to achieving the region's GHG emissions reduction target established by SB 375. MTC is also supportive of ARB's goal of fostering zero emission transit in the state, including the use of Volkswagen funds for zero emission buses, hydrogen fueling stations and other related infrastructure.

Ms. Analisa Bevan
December 16, 2016

MTC urges ARB to use its authority to approve Volkswagen's draft ZEV Investment Plan, in whole or in part, to assertively shape the investment plan to ensure that it complies with ARB's principles and priorities, funds high-impact projects, and makes effective use of this one-time funding source.

One area of concern is ARB's principle that a significant percentage (25%) of the funds should be dedicated to investments located in disadvantaged communities (DACs). While MTC supports guidelines to ensure that low-income residents and communities gain benefits from VW's ZEV investments, almost half of the state's low-income communities (defined as census tracts with a median income below 80 percent of the statewide median income) are excluded from the state's current definition of DACs, based on the top 25 percent score of CalEnviroScreen. As such, we urge you to consider an alternate definition of DAC for the purpose of this investment program, such as one that focuses on areas with low socioeconomic status in conjunction with a lack of EV charging infrastructure. More generally, we continue to work with CalEPA in hopes of developing tools and methodologies for identifying DACs in a manner that better corresponds to low-income communities in the Bay Area and statewide.

MTC also urges the Air Resources Board to disseminate information on the funding opportunity presented by the Volkswagen settlement more widely to potential project sponsors, including cities (for the Green City Initiative) and public transit operators (for zero-emission transit applications).

MTC looks forward to continuing to work with ARB to implement this critical investment opportunity. Please contact me at 415-778-5250 with any questions.

Sincerely,

A handwritten signature in black ink that reads "Alix P. Bockelman". The signature is written in a cursive style and is followed by a horizontal line.

Alix Bockelman
Deputy Executive Director, Policy

AB: GT

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