



Air Pollution Control District
San Luis Obispo County



Ventura County
Air Pollution
Control District



December 16, 2016

Mr. Mark Williams, Mailstop 3E
Air Resources Board
PO Box 2815
Sacramento, CA 95812

Subject: Plug-In Central Coast Comments Regarding Volkswagen's Zero Emission Vehicle (ZEV) Investment Commitment

Dear Mr. Williams:

The Steering Committee for Plug-In Central Coast (PCC) - a regional collaborative for the Tri-Counties region of Ventura, Santa Barbara, and San Luis Obispo Counties - appreciates the opportunity to provide this comment letter regarding the Volkswagen (VW) ZEV Investment Commitment. Our collaborative of agencies and non-profits supported development of the PCC Electric Vehicle Readiness Plan for Ventura, Santa Barbara, and San Luis Obispo Counties. We are currently preparing a Tri-Counties Hydrogen Readiness Plan. PCC encourages and facilitates the mass adoption of ZEVs throughout the Central Coast region.

We support all four areas of qualified investments identified in Appendix C of the proposed Partial Consent Decree (the ZEV Investment Commitment), including funding pathways for ZEV Infrastructure, Public Awareness, Increasing ZEV Access, and Green City development. We support investments to facilitate the mass adoption of both plug-in electric vehicles (PEVs) and fuel cell electric vehicles (FCEVs). We believe that the highest priorities for investment during the first 30-month cycle should be early, visible investments in ZEV infrastructure. Investments in ZEV infrastructure should be guided by existing regional Readiness Plans, in addition to the State plans and policies identified during the December 8 workshop for the ZEV Investment Commitment.

PEV charging infrastructure investments should facilitate:

- Installation of workplace and multi-unit dwelling (MUD) charging infrastructure to enable increased consumer adoption of PEVs
- Publicly-accessible PEV charging infrastructure installations, including DC Fast Charge stations that will enable longer-distance PEV travel
- Charging infrastructure to support innovative e-mobility solutions, including PEV rideshares, car shares, vanpools, and ride hailing services

- Building charging infrastructure paired with battery storage for transit and freight applications
- Increasing the deployment of electric buses and trucks

For FCEV and hydrogen infrastructure investments, PCC supports the following priorities:

- Quickly expanding the number of hydrogen stations to enable rapid scaling of FCEV adoption
- Expanding renewable hydrogen, with a preference for projects that provide local production
- Building hydrogen stations for transit and freight, and increasing the deployment of FCEV buses and trucks
- Increasing public “hydrogen literacy” through awareness campaigns, such as the California Fuel Cell Partnership’s forthcoming “Powered by the fastest molecule on Earth” initiative

For the greatest impact, FCEV infrastructure investments should support a resilient network of stations by installing at least two stations in a given area, so local vehicle operators will still be able to refuel if any one station is out of service. The network should also support the use of US Route 101 as a travel corridor, with a focus on closing the gap in hydrogen fueling infrastructure between Santa Barbara and San Jose.


PCC is encouraged to see planned investment for ZEV car shares, rideshares, and ride hailing services. Our partners support early investment in pilot projects that will increase ZEV access and use through the sharing economy. We also support workforce training and education programs to increase the number of skilled ZEV automotive technicians and mechanics.

In addition to the investments planned for Disadvantaged Communities as designated under SB 535, PCC supports programs and projects that will direct funds to low-income households and communities as defined under AB 1550. This will help ensure that ZEV Investment Commitments also benefit disadvantaged areas that are not identified under CalEPA’s current Disadvantaged Communities definition.

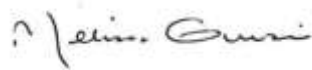
Please contact Molly Pearson at 805-961-8838 or mmp@sbcapcd.org, or any other member of the Steering Committee, if you have any questions regarding Plug-in Central Coast’s comments.

Sincerely,

Members of the Plug-in Central Coast Steering Committee:



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