



RURAL COUNTY REPRESENTATIVES
OF CALIFORNIA

December 12, 2018

Ms. Mary Nichols
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments on Volkswagen's Electrify America Proposed Zero Emission Vehicle Investment Plan: Cycle 2

Dear Chair Nichols:

On behalf of the Rural County Representatives of California (RCRC), I write to submit comments on the Electrify America proposed Zero Emission Vehicle (ZEV) Investment Plan: Cycle 2 (Cycle 2 ZEV Investment Plan) that Volkswagen (VW) has put forward. RCRC is an association of thirty-six rural California counties, and the RCRC Board of Directors is comprised of an elected supervisor from each of those member counties. Our concern is the proposed inadequate funding for rural electric vehicle (EV) charging stations. As currently drafted, VW's plan leaves California's rural communities behind.

VW deceived California consumers and violated state environmental and consumer protection laws with illegal "defeat device" software installed in diesel vehicles to cheat on emissions tests. These vehicles emitted up to 40 times the legally allowed amount of nitrogen oxide into California's air. The software enabled the cars to sense when they were being tested and emit far less pollution at that time. The settlement you negotiated provides \$800 million to promote zero-emissions vehicles through activities such as research or infrastructure development.

We understand the Air Resources Board has the authority to, in whole or in part, approve or disapprove VW's proposed plans. This settlement was designed as a penalty for VW's wrongdoing and to mitigate the pollution caused by this fraud statewide. RCRC's member counties' population accounts for 10.81 percent of the state's total population and there are many rural populations in more urbanized counties. Yet, in VW's Cycle 2 ZEV Investment Plan, of the approximately \$200 million proposed in Cycle 2, only \$2 million, or 1 percent, is proposed for 35–50 rural charging stations. This is inadequate and short-changes the state's rural communities.

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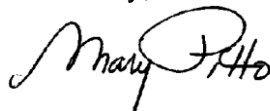
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In addition, the rural pilot program for EV infrastructure identifies rural areas as, including, but not limited to, the Central, Imperial, and Coachella Valleys. The "but not limited to" represents approximately 24 RCRC member counties. Will efforts be made to distribute EV charging stations to these areas as well?

As the Air Resources Board concluded in its own Final Guidance Document titled, "Low-Income Barriers Study, Part B: Overcoming Barriers to Clean Transportation Access for Low-Income Residents," dated February 21, 2018, "More transportation electrification infrastructure is needed in rural areas." It further stated, "As California moves to an increasingly electrified transit grid, rural areas stand to become further isolated if charging infrastructure sites are primarily based in high traffic locations."

RCRC urges the Air Resources Board to amend VW's Cycle 2 ZEV Investment Plan to provide rural communities an appropriate percentage of the ZEV Investment Funds for EV charging stations in rural areas statewide. RCRC appreciates this opportunity to comment on the proposed plan. If you have any questions or wish to have further discussions, please contact me at mpitto@rcrcnet.org or (916) 447-4806.

Sincerely,



MARY PITTO
Regulatory Affairs Advocate

cc: Members, California Air Resource Board