

# CITY OF LOS ANGELES

CALIFORNIA

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December 12, 2018

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

### **RE: Comments in Support of Electrify America LLC's Cycle 2 California ZEV Investment Plan**

Dear Chairwoman Nichols,

On behalf of the Taxicab & Franchise Regulation Division of the Los Angeles Department of Transportation (LADOT), I respectfully submit the following comments in support of Electrify America LLC's Cycle 2 California Zero Emission Vehicle Investment Plan ("Plan").

As discussed in the Plan, Los Angeles and other major metropolitan cities are exploring how we might introduce electric vehicles into our ride-hail and taxi fleets. The transition of shared mobility to electric has the potential to save drivers money, as is detailed in the Plan, and it is consistent with the city's emissions and climate goals.

While the transition of these vehicles to electric presents numerous benefits, one of the key issues that the Taxicab & Franchise Regulation Division has identified is the availability and accessibility of DC fast charging generally and ultra-fast charging in particular. Shared mobility vehicles require charging stations at locations convenient to their unique routes, including stations near transportation hubs and high traffic areas. And charging speed is critical, as every minute spent refueling is a minute they cannot be generating fares. It is crucial that the transition to electric shared mobility comes without compromise to cost or convenience for the driver.

We were therefore pleased to see that Electrify America plans to collaborate with the shared mobility industry, including drivers, taxi companies, airport authorities, city governments, and regulatory bodies to select two to three metros from its Cycle 2 metros for investment in shared mobility targeted infrastructure. I believe that Los Angeles has the ability to put in place the right combination of local regulations, incentives, and support for electrification of shared mobility vehicles to attract this investment. In the taxi industry, this investment will also improve the prospect for drivers to increase their wages by lowering fuel costs.



In closing, Electrify America's Cycle 2 ZEV Investment Plan will positively support investment in businesses, workers, and communities across California. Moreover, as Los Angeles prepares for the Olympics in 2028, electrification of shared mobility vehicles is an important priority for the LADOT. However, the electrification of commercial shared mobility vehicles cannot be accomplished without adequate investment in fast-charging infrastructure. On behalf of myself, and the Taxicab & Franchise Regulation Division of the LADOT which oversees taxicab regulation in Los Angeles, we welcome and support CARB's approval of Electrify America's Cycle 2 California ZEV Investment Plan.

Sincerely,



Jarvis Murray  
Administrator, Taxicab and Franchise Regulation Division  
Los Angeles Department of Transportation (LADOT)

