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San Joaquin Valley Air
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SJV Clean Cities Coalition

SJV Clean Energy
Organization

Umbrella Management
Project Clean Air
TIN: 33-0472571

Brenda Turner
Courtney Velasco

California Air Resources Board
Chair Mary Nichols and Board

April 10, 2017

RE: California ZEV Investment Plan Cycle One as submitted by Volkswagen

Chair Nichols and Board,

The San Joaquin Valley Electric Vehicle Partnership submitted a proposal on behalf of the greater Central Valley Region for charging and public outreach. We appreciate the opportunity to submit comments on the California ZEV Investment Plan: Cycle 1 submitted by Volkswagen.

We urge CARB to reject Electrify America's plan as presented. *We feel the plan must prioritize investments in the Central Valley in line with CARB's request to invest 35% in DACs; and more specifically, in rural or lower population DACs.*

We recommend that out of the \$45 million VW is allocating for community charging, at least \$15.75 million (35%) be targeted to DACs statewide. With 75% of the DACs statewide located in the San Joaquin Valley, \$12 million of the \$15.75 million should be allocated to Valley DAC communities.

This is not charity. It is restitution. And a well-placed investment. The Central Valley was disproportionately impacted by the excess emissions of VW cars and cheat devices. Considered among the worst regions for air quality in the Nation, the need for relief from mobile source pollution is acute.

We hope to hit some middle-ground in the debate about investments in DACs. We believe there is great opportunity here to meet the objectives of all parties in making impactful investments.

Guidance was vague as to proposal content and evaluation criteria. Our proposal didn't reflect EV market data. We offer it now to strengthen the argument that the San Joaquin Central Valley has a productive and accelerating EV market in spite of a lack of charging infrastructure. Our proposal also did not include the numerous partnerships and specific innovative transportation projects and opportunities happening in the San Joaquin Valley.

We believe VW's plan assumes people in DACs can't afford EVs, meaning charging infrastructure would go underutilized and the investments wasted. We've conducted some market research. Our findings may surprise you.

In our response we offer data obtained from the California Center for Sustainable Energy's Clean Vehicle Rebate Program website.

ZEV adoption rates in the San Joaquin Central Valley have accelerated beyond the markets of Sacramento Metro, El Dorado, and Placer counties combined! Sacramento is currently experiencing negative growth, while the Valley is accelerating. We think this finding is remarkable when considering lack of infrastructure in the Valley to support market growth! It is clear this region needs and deserves charging infrastructure now!

While fleet data is not included in this analysis, the generous local incentives combined with State fleet rebates – discounting up to \$35,000 off the price of a BEV - are also driving light duty purchases at every municipal, county, utility, non-profit (including hospitals), school district and college campus in the Valley.



San Joaquin Valley
Clean Cities Coalition

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The most productive regions in order of highest adoption are Fresno, San Joaquin County, Kern and Stanislaus. The rural communities of Tulare, Madera, and Mariposa are still lagging.

There is demand from consumers, government and commercial fleets for zero emission utility vehicles. The Valley is known as "Ford F-150 Country". With consumers, government and commercial fleets all qualifying for major incentives, a plug-in SUV would do well here.

With a new gas tax of 12 cents-per-gallon in California, the case to go electric becomes more compelling to people of all income levels as well as fleets.

Recommended Investments

- Although more public and highway DC fast charging is needed, there are now grant programs that support this. VW's investments can supplement these funds for more impact. But we believe VW investments should be prioritized to first support areas of need that will more effectively drive the market, and for which there is currently no grant funding.
- There are no grants for Workplace and MUD's unless they can offer public access. The Partnership can work with VW to help determine the most impactful investments in this area.
- Public outreach is another critical need. Many residents still don't know about EV's and the Valley's special incentives that make them affordable. Thanks to incentives, many low to moderate income people can now afford EV's. And not everyone in the Valley is low income. In addition, the Partnership conducts education in local schools, technician training, first responder training, and sales force training.
- UC Davis just completed a Shared Mobility study in the San Joaquin Valley which identifies opportunities to work within the existing infrastructure of an effective Valley-wide vanpool program and transit programs for future carshare, ridesource, and ridesplitting. VW funding could address the creation of EV charging networks to serve emerging electric van, transit and carshare programs.
- We like that VW is working with many vendors. We welcome and request VW focus on providing a level playing field for all appropriately vetted charging vendors in the market, several of whom are part of this Partnership and probably already working with Electrify America. As an early developing market, it's best for the Valley if no one vendor dominates the market with technologies or proprietary network models.
- National Parks and Tourism: The Central Valley is gateway to Yosemite National Park, Sequoia and Kings Canyon, drawing millions of visitors each year. Scarce electric vehicle charging is available to visitors of these parks. The Partners are engaged with the NPS in Yosemite.

We believe there is real opportunity for VW in doing the right thing. The Central Valley has the best ZEV incentives in the Nation to support market growth thanks to the region's special gas tax that funds the programs. There is also a learning opportunity for VW, California and other states about how to grow an early market through regional incentives. The missing links are community charging infrastructure at workplaces and MUD's, and public education and outreach.

Don't make the Valley wait! Let's work together and make a better plan.

Sincerely,

Bill Williams

San Joaquin EV Partnership
Chair Bill Williams, Telefonix

Executive Committee:

Laura Bone, Market Development
John Clements

Sarah Farell, San Joaquin Valley Clean Energy Organization
Ismael Herrera, CSU Fresno Office of Community and Economic Development
Dave Teasdale, Kern Community College District Energy Center
San Joaquin Valley Air Pollution Control District
San Joaquin Valley Clean Cities Coalition

Supplemental Information: Incentives and Market Data

Incentives Exclusive to San Joaquin Central Valley Residents and Fleets

- Special incentives up of \$12,000 for low and moderate income consumers (plus Fed rebate + State rebate + local \$3K rebate) through a scrap and replace program
- Charge Up! incentives for moderate to high income consumers of \$3,000 (+ State/Fed rebate)
- Incentives for home charging
- Grants for publicly-accessible charging – released last year
- Fleet rebates of \$100,000 per fleet per year, or \$20,000 off per vehicle (many going to light duty vehicle purchases)
- Using local rebates and Public Fleet Pilot Projects, fleets can receive a combined \$30,000 off per light-duty BEV vehicle and \$25,525 for a PHEV.

EMFP Plus Up Program for low – moderate income: https://www.arb.ca.gov/newsrel/efmp_plus_up.pdf

Charge Up! Program: <http://valleyair.org/grants/chargeup.htm>

Public Benefit Grants for consumers and fleets: <http://valleyair.org/grants/publicbenefit.htm>

Tune In Tune Up: <http://valleyair.org/grants/pass.htm>

Public Fleet Pilot Project: <https://cleanvehiclerebate.org/eng/pfp>

CVRP Market Data

The following market data comes from California Center for Sustainable Energy's data tool for tracking vehicle rebates.

Market comparisons were made between the Central Valley region and Sacramento Metro, El Dorado and Placer counties combined.

*Sacramento Metro population of 2,337,545
San Joaquin Central Valley population of 3,906,475*

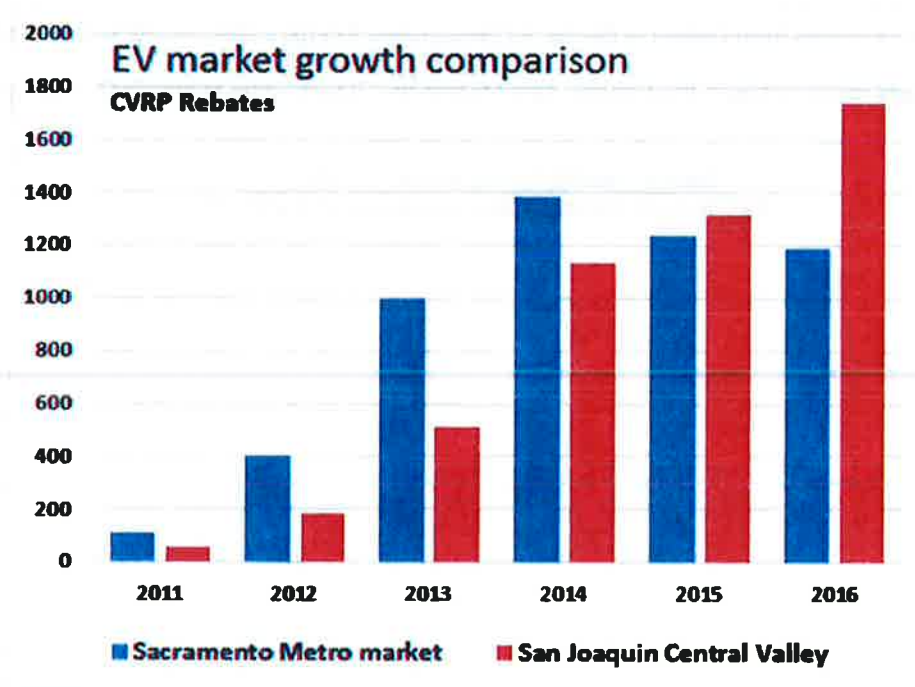
Market Growth Comparisons between San Joaquin Central Valley and Sacramento, El Dorado and Placer Counties combined

Year	Sacramento Metro market		San Joaquin Central Valley	
	Actual	% Growth	Actual	% Growth
2011	108		60	
2012	401	271%	182	203%
2013	995	148%	513	182%
2014	1386	39%	1140	122%
2015	1240	-11%	1318	16%
2016	1192	-4%	1741	32%

5 yr Average Growth 2012-16

89%

111%



Market Productivity

Fresno	951	Tulare	105
San Joaquin County	547	Madera	90
Kern	485	Mariposa	10
Stanislaus	270		



San Joaquin Valley
**Electric Vehicle
 Partnership**

SJVEVP Members

Adomani Electric
Aerovironment, Inc.
SunPower by Quality Home Services
America's Job Center of California
American Chevrolet
APG Solar
Barber Honda
Big Valley Ford
BMW Fresno
California Center for Sustainable Energy
California Community Colleges, Advanced Transportation & Renewable Energy Sector
California Energy Commission
California Plug-In Electric Vehicle Collaborative
California Workforce Investment Board
CaliforniaFirst
CALSTART
Carbon Day Automotive
Center for Climate Protects
Charge Across Town
ChargePoint, Inc.
City of Bakersfield
City of Farmersville
City of Fresno
City of McFarland
City of Porterville
City of Riverbank
City of Sanger
City of Stockton
City of Tracy
City of Turlock Irrigation District
Clements School Transportation Consulting
Clipper Creek, Inc.

Clovis Community College Center
Clovis Unified School District
County of San Joaquin
CSU Bakersfield
Domino Plastics
Eckhaus Fleet
Efficient DriveTrains
Electric Car Pledge
Electric Vehicle International
Envision Solar
EV Connect
EV Perks
EV R US
EVgo
EVoCharge
FedEx Ground
Foresight Renewable Solutions
Fresno City College
Fresno Unified School District
Greater Stockton Chamber of Commerce
GreenPower
GS Consulting
Hedrick's Chevrolet
Silva, John (Individual)
International Facility Management Association-Central Valley Chapter
Kazanc Energy, LLC
Kenworth Truck Company
Kern Community College District
Kern EDC
Liberty Plug-Ins
LightMoves
Lithia Clovis Nissan
Long Beach Electric Car Company
Motiv Power Systems

National Energy Technology Lab, U.S. DOE
Nissan North America, Inc.
NOVA Workforce Development
OCED at Fresno State
PG&E
Phil Haupt Electric, Inc.
Plug-In America
Proterra
Razzari Auto Centers
Razzari Nissan
REACH Strategies
Recargo
Resurgens Renewables
San Joaquin Valley Air Pollution Control District
San Joaquin Valley Latino Environmental Advancement & Policy Project (Valley LEAP)
SCE
Schneider Electric
SJV Clean Energy Organization
Solomon Electric and Data, Inc.
Square D by Schneider Electric
Stanislaus Economic Development and Workforce Alliance
State of CA, Office of Governor
StoutPower Consulting, LLC
Telefonix, Inc.
Time Structures, Inc.
Transpower
U.S. EPA
U.S. Green Vehicle Council, Cleantech Institute
UC Davis

UC Merced
UPS-West Region
Via Motors
Zenith Motors

