

## **Comment 1 for Zero Emission Vehicle Regulation 2013 (zev2013) - 45 Day.**

First Name: Claire  
Last Name: van Zuiden  
Email Address: claire@calstrat.com  
Affiliation:

Subject: zev2013 Comment Letter  
Comment:

Air Resources Board and Staff,

On behalf of Proterra, please see the attached letter requesting the Board to consider modifications to the Zero Emission Vehicle Regulation (ZEV program) to apply to medium- and heavy-duty vehicles over 14,000 pounds.

We appreciate the opportunity to provide comments on the ZEV program and the efforts of ARB to reduce GHG and health-based air pollutants.

Thank you,  
Claire van Zuiden  
Associate  
California Strategies

Attachment: [www.arb.ca.gov/lists/com-attach/1-zev2013-BX9QM1UiAGEFMwIz.pdf](http://www.arb.ca.gov/lists/com-attach/1-zev2013-BX9QM1UiAGEFMwIz.pdf)

Original File Name: zev2013 Comment Letter\_Proterra.pdf

Date and Time Comment Was Submitted: 2013-10-17 17:37:55

No Duplicates.

**Comment 2 for Zero Emission Vehicle Regulation 2013 (zev2013) - 45 Day.**

First Name: Don

Last Name: Siefkes

Email Address: donsiefkes@aol.com

Affiliation: E100 Ethanol Group - Executive Director

Subject: ZEV2013 Comments

Comment:

Please see attachment.

Attachment: [www.arb.ca.gov/lists/com-attach/2-zev2013-UigBYlwrVzYANIBh.doc](http://www.arb.ca.gov/lists/com-attach/2-zev2013-UigBYlwrVzYANIBh.doc)

Original File Name: ZEV2013\_hearing\_oct24\_commmments.doc

Date and Time Comment Was Submitted: 2013-10-18 10:53:43

No Duplicates.

## **Comment 3 for Zero Emission Vehicle Regulation 2013 (zev2013) - 45 Day.**

First Name: Claire  
Last Name: van Zuiden  
Email Address: [claire@calstrat.com](mailto:claire@calstrat.com)  
Affiliation:

Subject: EVI Comment Letter - zev2013  
Comment:

Air Resources Board and Staff,

On behalf of Electric Vehicles International (EVI), please see the attached letter requesting the Board to consider modifications to the Zero Emission Vehicle Regulation (ZEV program) to apply to medium- and heavy-duty vehicles over 14,000 pounds.

We appreciate the opportunity to provide comments on the ZEV program and the efforts of ARB to reduce GHG and health-based air pollutants.

Thank you,  
Claire van Zuiden  
Associate  
California Strategies

Attachment: [www.arb.ca.gov/lists/com-attach/3-zev2013-VDdcNQBsvGoHZFc5.pdf](http://www.arb.ca.gov/lists/com-attach/3-zev2013-VDdcNQBsvGoHZFc5.pdf)

Original File Name: Comments to the Board\_EVI\_zev2013.pdf

Date and Time Comment Was Submitted: 2013-10-18 16:37:05

No Duplicates.

## **Comment 4 for Zero Emission Vehicle Regulation 2013 (zev2013) - 45 Day.**

First Name: Debbie

Last Name: Baron

Email Address: mendocinodeb@gmail.com

Affiliation: Mendo Alcohol Fuel Grou

Subject: It is time for vehicles with optimized ethanol engines to have ZEV status

Comment:

Dear Members of the Board:

As you begin considering minor modifications to the Zero Emission Vehicle Regulation, I respectfully ask you to consider granting ZEV status to optimized ethanol engines running on E98 Ethanol fuel (98/2 Etoh/ipOH). Why? Because ethanol fuel is a carbon neutral fuel, especially in an engine built for it. Many myths about ethanol abound. These are well documented in David Blume's important book, Alcohol Can Be A Gas. But ethanol is a fuel that can be easily made out of many varieties of biomass, and not just from corn. If grown and harvested according to the methods of permaculture, feedstocks can produce low cost ethanol with very little cultivation. Such will mitigate extreme climate change, bolster America's energy independence, reinvigorate the economy, and establish international peace and security. And ethanol does not require massive infrastructure development, or rely on invasive, expensive, controversial, and polluting extraction operations. Today, critics make much about how ethanol fuel does not perform as well as gasoline fuel. But this is unfair since ethanol is being asked to perform in engines optimized for gasoline. Even though critics level their complaints, ethanol fuel is a fact of life and more and more of it is being used as the years go by. It is the 21st century and this writer believes that many new and different transportation styles will soon be upon us. Already, there are plans for electric cars, air cars, hydrogen cars, and driverless cars. In the ZEV Emission Vehicle Regulations there is language for some of these innovative vehicles. But, is there language for vehicles with optimized ethanol engines running on E98, which is denatured with the non-petroleum chemicals isopropyl alcohol and denatonium benzoate? If not, there should be. Soon, vehicles with optimized ethanol engines will be developed. And because the optimized ethanol engine uses carbon neutral ethanol fuel, cars and trucks designed with 21st century optimized ethanol engines and fuel should be granted Zero Emissions Vehicle Status.

Thank you,

Debbie Baron,

Secretary of the Mendo Alcohol Fuel Group

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-10-19 12:08:39

No Duplicates.

**Comment 5 for Zero Emission Vehicle Regulation 2013 (zev2013) - 45 Day.**

First Name: Tracy

Last Name: Woodard

Email Address: Non-web submitted comment

Affiliation:

Subject: NISSAN COMMENT LETTER

Comment:

Attached please find Nissan Comment Letter.

Attachment: [www.arb.ca.gov/lists/com-attach/5-zev2013-Uz0BbgFzWXkAZ1I8.pdf](http://www.arb.ca.gov/lists/com-attach/5-zev2013-Uz0BbgFzWXkAZ1I8.pdf)

Original File Name: Nissan.pdf

Date and Time Comment Was Submitted: 2013-10-21 10:34:11

No Duplicates.

**Comment 6 for Zero Emission Vehicle Regulation 2013 (zev2013) - 45 Day.**

First Name: Steven

Last Name: Douglas

Email Address: sdouglas@autoalliance.org

Affiliation: Alliance of Automobile Manufacturer

Subject: Minor Modifications to the Zero Emission Vehicle Regulation

Comment:

Attached are the comments of the Alliance of Automobile  
Manufacturers on the subject regulation.

Best regards,  
Steve Douglas

Attachment: [www.arb.ca.gov/lists/com-attach/6-zev2013-AjBcalNjAmIHLAQ1.pdf](http://www.arb.ca.gov/lists/com-attach/6-zev2013-AjBcalNjAmIHLAQ1.pdf)

Original File Name: 2013-10-21 Alliance ZEV Letter.pdf

Date and Time Comment Was Submitted: 2013-10-22 13:20:58

No Duplicates.

## **Comment 7 for Zero Emission Vehicle Regulation 2013 (zev2013) - 45 Day.**

First Name: joanna

Last Name: becker

Email Address: joanna@groundplan.net

Affiliation:

Subject: E100 fuel

Comment:

Please make E100 fuel an option for zero emissions in California. Once it is approved the technology can make it happen. We deserve clean air and renewable fuel for ourselves and future generations

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-10-23 09:38:59

No Duplicates.



## **Comment 8 for Zero Emission Vehicle Regulation 2013 (zev2013) - 45 Day.**

First Name: Daniel

Last Name: Ryan

Email Address: dryan2@mazdausa.com

Affiliation: Group of Intermediate Volume OEMs

Subject: Comments on ZEV 2013

Comment:

Attached are joint comments of a group of Intermediate Volume Manufacturers including Jaguar Land Rover, Mitsubishi Motors, Mazda, Subaru and Volvo Cars.

Attachment: [www.arb.ca.gov/lists/com-attach/8-zev2013-B2FTPFwzUGIKYAhX.pdf](http://www.arb.ca.gov/lists/com-attach/8-zev2013-B2FTPFwzUGIKYAhX.pdf)

Original File Name: Final IVM Comments for Oct 24 ARB meeting.pdf

Date and Time Comment Was Submitted: 2013-10-23 10:23:30

No Duplicates.

**Comment 9 for Zero Emission Vehicle Regulation 2013 (zev2013) - 45 Day.**

First Name: David

Last Name: Reichmuth

Email Address: dreichmuth@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: ZEV regulation

Comment:

Please see attached comment letter.

Attachment: [www.arb.ca.gov/lists/com-attach/10-zev2013-VzhcOVUgBDhVMQVg.pdf](http://www.arb.ca.gov/lists/com-attach/10-zev2013-VzhcOVUgBDhVMQVg.pdf)

Original File Name: October 2013 Board Hearing Comments\_2013\_10\_22.pdf

Date and Time Comment Was Submitted: 2013-10-23 10:54:57

No Duplicates.

## **Comment 10 for Zero Emission Vehicle Regulation 2013 (zev2013) - 45 Day.**

First Name: Azita  
Last Name: Khalili  
Email Address: azita.khalili@bmwna.com  
Affiliation: BMW

Subject: BMW Comments ZEV Modifications  
Comment:

Attached please find BMW comments on the proposed modifications to the California Zero Emission Vehicle regulation.

Kind Regards,

Dr. Azita Khalili

Attachment: [www.arb.ca.gov/lists/com-attach/11-zev2013-UTNcN1chBAhXMgZp.pdf](http://www.arb.ca.gov/lists/com-attach/11-zev2013-UTNcN1chBAhXMgZp.pdf)

Original File Name: BMW\_comments\_ZEV\_minor revisions 20131024 - Board Hearing.pdf

Date and Time Comment Was Submitted: 2013-10-23 11:12:28

No Duplicates.

## **Comment 11 for Zero Emission Vehicle Regulation 2013 (zev2013) - 45 Day.**

First Name: lee  
Last Name: wilhelm  
Email Address: luckyleewilhelm@gmail.com  
Affiliation: -

Subject: zero emissions truth  
Comment:

California's over-reliance on motor vehicles contributes to a variety of public health problems, such as obesity and social isolation, which cannot be solved simply by replacing internal combustion engines with batteries or fuel cells. On the other hand, bicycling is affordable for the masses and, as documented by recent studies regarding active transport, confers enormous health benefits. Moreover, cycling (and walking) are truly zero-emissions. Their in-use emissions do not depend on transitioning to a low-carbon electricity grid. Their manufacture requires only a small fraction of the materials and energy required for motor vehicles.

A cycling infrastructure would enable a truly zero emissions vehicle to satisfy a critical fraction of California's transportation needs, while boosting Californian's health, quality of life, and social fabric. Maintaining cycling infrastructure would cost, per mile travelled, only a small fraction of what the current automotive infrastructure demands. Evidence from other countries, such as Denmark and the Netherlands, who have mobilized the political will to provide safe cycling infrastructure for their citizens suggest that bicycles are a vehicle that the ARB would be foolish not to support.

Please reconsider your ZEV portfolio. Please provide the citizens of California with an equitable, affordable, healthy, and truly zero-emissions transportation option. Please continue to maintain California's leadership in transportation strategies. As the Germans say in their campaign targeting active transport for trips of less than 5 km: "kopf an, motor aus!" (Turn your head on, your motor off.)

The urgency of our climate problems demand the courage for ARB to promulgate truly visionary strategies.

Thank you for your consideration and for your hard work.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-10-23 11:30:47

No Duplicates.

## **Comment 12 for Zero Emission Vehicle Regulation 2013 (zev2013) - 45 Day.**

First Name: Brennan  
Last Name: Beach  
Email Address: brennan@voltronix.com  
Affiliation: Voltronix

Subject: Conversion of electric vehicles and ZEV credit eligibility  
Comment:

We represent a large segment of the battery and electric vehicle (EV) industry in California and are writing to encourage the California Air Resources Board to grant credits under the Zero Emitting Vehicle program (ZEV credits) to owners that convert traditional cars and trucks to EVs. Attached is a letter outlining our suggestion in more detail.

Thank you for your consideration.

Sincerely yours,  
Brennan Patrick Beach  
President, Voltronix

Attachment: [www.arb.ca.gov/lists/com-attach/13-zev2013-AmcGdlMNVGQGbwBu.pdf](http://www.arb.ca.gov/lists/com-attach/13-zev2013-AmcGdlMNVGQGbwBu.pdf)

Original File Name: EV\_Conversion\_Letter\_Final.pdf

Date and Time Comment Was Submitted: 2013-10-23 11:44:11

No Duplicates.

**Comment 13 for Zero Emission Vehicle Regulation 2013 (zev2013) - 45 Day.**

First Name: Michael

Last Name: Lord

Email Address: michael.lord@tema.toyota.com

Affiliation: Toyota

Subject: Submission of Toyota Comment

Comment:

Please find attached Toyota's comments.

Attachment: [www.arb.ca.gov/lists/com-attach/14-zev2013-UGEGMwEtBGYDNAQp.pdf](http://www.arb.ca.gov/lists/com-attach/14-zev2013-UGEGMwEtBGYDNAQp.pdf)

Original File Name: 13-11-24 ZEV Board Hearing Comment (Toyota).pdf

Date and Time Comment Was Submitted: 2013-10-23 11:37:06

No Duplicates.

## **Comment 14 for Zero Emission Vehicle Regulation 2013 (zev2013) - 45 Day.**

First Name: Trina

Last Name: Mackie

Email Address: trina.mackie@tu.edu

Affiliation: Touro University California

Subject: need to consider bicycles as zero emissions vehicles

Comment:

Cycling is already an important form of transportation and unfortunately under-utilized in California and the United States at large. Cycling is affordable, effective, fun, and offers a multitude of co-benefits (e.g., health, not to mention happiness). Cycling should not be left out of the ARB's Zero Emission Vehicle Program. Along with the health co-benefits, cycling brings sizable climate co-benefits, as rigorously assessed by the 2013 peer-reviewed study of the California Department of Public Health authored by Maizlish et. al. and titled, "Health Cobenefits and Transportation-Related Reductions in Greenhouse Gas Emissions in the San Francisco Bay Area". The article is available in the April 2013 issue of the American Journal of Public Health.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2013-10-23 11:40:54

No Duplicates.



**Comment 15 for Zero Emission Vehicle Regulation 2013 (zev2013) - 45 Day.**

First Name: Diarmuid  
Last Name: O'Connell  
Email Address: Diarmuid@teslamotors.com  
Affiliation:

Subject: Tesla Comments - ZEV Mandate  
Comment:

Please see letter attached.

Attachment: [www.arb.ca.gov/lists/com-attach/16-zev2013-W2kHMQAAGBRZgEx.pdf](http://www.arb.ca.gov/lists/com-attach/16-zev2013-W2kHMQAAGBRZgEx.pdf)

Original File Name: 20131023 Tesla Comments - ZEV Mandate.pdf

Date and Time Comment Was Submitted: 2013-10-23 11:56:41

No Duplicates.

**Comment 1 for Zero Emission Vehicle Regulation 2013 (zev2013). (At Hearing)**

First Name: Michael  
Last Name: Hartrick  
Email Address: mdh25@chrysler.com  
Affiliation: Chrysler Group

Subject: Chrysler Group Comments  
Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/18-zev2013-BmsBblEzU2hRNngdi.pdf](http://www.arb.ca.gov/lists/com-attach/18-zev2013-BmsBblEzU2hRNngdi.pdf)

Original File Name: Michael Hartrick 13-9-4.pdf

Date and Time Comment Was Submitted: 2013-10-29 09:37:57

No Duplicates.

**Comment 2 for Zero Emission Vehicle Regulation 2013 (zev2013). (At Hearing)**

First Name: Don

Last Name: Siefkes

Email Address: donsiefkes@aol.com

Affiliation: E100 Ethanol Group - Executive Director

Subject: ZEV2013 Comments

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/19-zev2013-VDBTOIM8WVUHclI7.pdf](http://www.arb.ca.gov/lists/com-attach/19-zev2013-VDBTOIM8WVUHclI7.pdf)

Original File Name: Don Siefkes.pdf

Date and Time Comment Was Submitted: 2013-10-29 09:37:57

No Duplicates.

**Comment 3 for Zero Emission Vehicle Regulation 2013 (zev2013). (At Hearing)**

First Name: Julia  
Last Name: Rege  
Email Address: jrege@globalautomakers.org  
Affiliation: Global Automakers

Subject: ZEV Success  
Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/20-zev2013-UjhXJAFsVW9RNlcI.pdf](http://www.arb.ca.gov/lists/com-attach/20-zev2013-UjhXJAFsVW9RNlcI.pdf)

Original File Name: Julia Rege.pdf

Date and Time Comment Was Submitted: 2013-10-29 09:37:57

No Duplicates.

**Comment 4 for Zero Emission Vehicle Regulation 2013 (zev2013). (At Hearing)**

First Name: Robert

Last Name: Bienenfeld

Email Address: Robert\_Bienenfeld@ahm.honda.com

Affiliation: Honda

Subject: Honda Comments

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/21-zev2013-UCJVPFc0VWNVIQN3.pdf](http://www.arb.ca.gov/lists/com-attach/21-zev2013-UCJVPFc0VWNVIQN3.pdf)

Original File Name: Robert Bienenfeld.pdf

Date and Time Comment Was Submitted: 2013-10-29 09:37:57

No Duplicates.

**Comment 5 for Zero Emission Vehicle Regulation 2013 (zev2013). (At Hearing)**

First Name: Dave

Last Name: Patterson

Email Address: Non-web submitted comment

Affiliation: mitsubishi

Subject: mitsubishi Comments

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/22-zev2013-UjZWMQB3UmQGX1U1.pdf](http://www.arb.ca.gov/lists/com-attach/22-zev2013-UjZWMQB3UmQGX1U1.pdf)

Original File Name: Dave Patterson.pdf

Date and Time Comment Was Submitted: 2013-10-29 09:37:57

No Duplicates.

**Comment 6 for Zero Emission Vehicle Regulation 2013 (zev2013). (At Hearing)**

First Name: Steven

Last Name: Douglas

Email Address: sdouglas@autoalliance.org

Affiliation: Alliance of Automobile Manufacturer

Subject: Minor Modifications to the Zero Emission Vehicle Regulation

Comment:

Please see attached comments.

Attachment: [www.arb.ca.gov/lists/com-attach/23-zev2013-WilQIII2UncKaVQ6.pdf](http://www.arb.ca.gov/lists/com-attach/23-zev2013-WilQIII2UncKaVQ6.pdf)

Original File Name: Steven Douglas.pdf

Date and Time Comment Was Submitted: 2013-10-29 09:37:57

No Duplicates.

## **Comment 1 for Zero Emission Vehicle Regulation 2013 (zev2013) - 15-1.**

First Name: jason

Last Name: jungreis

Email Address: jasonjungreis@gmail.com

Affiliation: Golden Gate Electric Vehicle Association

Subject: strike proposed ZEV modification to reduce BEV incentives and increase hydrogen incentives

Comment:

Dear CARB:

CARB has proposed changing its ZEV credit system to greatly benefit possible hydrogen vehicles at the expense of existing electric vehicles

(<http://www.arb.ca.gov/regact/2013/zev2013/zev201315daynotice.pdf>).

This comment is presented under the public comment opportunity

([http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=zev2013&comm\\_period=1](http://www.arb.ca.gov/lispub/comm/bcsubform.php?listname=zev2013&comm_period=1)).

I believe hydrogen is a terrible way to go, and BEVs are the only way to go, and I encourage you to review the below lists and recognize the tremendous advantages of BEVs over hydrogen.

1. Hydrogen is very dangerous to handle.
  2. Hydrogen requires a completely new infrastructure at tremendous cost.
  3. Hydrogen is difficult to capture.
  4. Hydrogen is extremely dangerous to the crucial ozone layer.
  5. Hydrogen requires very expensive fuel cells.
  6. One means of producing hydrogen is by stripping it from carbon fuels in a process that requires energy and releases carbon dioxide.
  7. The other means of producing hydrogen is the separate it from water in a process that is at best 70% efficient.
  8. Hydrogen is used only in fuel cells that are at best 50% efficient (thereby yielding at best approximately 33% efficiency).
  9. Fuel cells produce water vapor which is a green house gas.
  10. Hydrogen infrastructure and vehicles are barely in existence and will require extreme taxpayer outlays to support it.
- 
1. BEVs exist now at a cost that beats any other vehicle total cost of ownership.
  2. BEVs approach 90% efficiency in the use of electricity.
  3. BEVs can directly utilize renewable energy.
  4. BEVs can bring greater efficiency to the grid and encourage more renewable energy sources by fueling at night.
  5. BEVs can and will provide smoothing and energy storage to the grid which is huge advantage to the continued development of renewable energy.
  6. BEV technology is already improving in efficiency and cost at a rate that hydrogen could never compete with even at its mythical best.
  7. BEV power infrastructure for vast adoption already exists.
  8. BEVs are the safest possible form of transportation.
  9. BEV public acceptance is already being achieved at great



speed.

10. There is already competition for commercial sale of BEVs such that the need for additional taxpayer monies to stimulate adoption is greatly reduced.

I urge CARB to abandon its misguided proposals to change its ZEV credit system.

Thanks.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-05 23:18:51

No Duplicates.

## **Comment 2 for Zero Emission Vehicle Regulation 2013 (zev2013) - 15-1.**

First Name: Lawrence

Last Name: Rhodes

Email Address: primobassoon@sbcglobal.net

Affiliation: Independent EV Repair

Subject: Hydrogen

Comment:

Mathematically speaking and practically speaking hydrogen makes no sense as a fuel. Natural gas beats hydrogen in every way. We get hydrogen from natural gas. We already have CNG vehicles. It is robbing Peter to pay Paul. Fuel cell vehicles are very expensive. Hydrogen is not a good fuel storage medium. It simply mimics the current gasoline/diesel/CNG/Propane infrastructure at a horrible premium. The math has been done. Battery electric vehicles with advanced battery technology is the obvious path. More efficient, cost effective, convenient (there is electricity in every building in the country) & very practical. Once you own a car with no oil changes, smog checks, tuneups or most other forms of traditional maintenance and has an energy requirement of a third to a quarter of a gas or diesel vehicle it is hard to contemplate going backward in technology. Hydrogen is a step backward in the goal of clean transportation. More costly in every way. Sincerely, Lawrence Rhodes PV/EV advocate. Running Solar & electrically for a decade and a half.

Attachment: [www.arb.ca.gov/lists/com-attach/25-zev2013-AGkFblUzUV0BMFJj.jpg](http://www.arb.ca.gov/lists/com-attach/25-zev2013-AGkFblUzUV0BMFJj.jpg)

Original File Name: IMG\_7151.jpg

Date and Time Comment Was Submitted: 2014-04-06 07:40:16

No Duplicates.

### **Comment 3 for Zero Emission Vehicle Regulation 2013 (zev2013) - 15-1.**

First Name: Jerome

Last Name: Block

Email Address: blytheblock@hotmail.com

Affiliation:

Subject: Decreasing Availability of \$ Credits to Tesla

Comment:

4/7/2014

Sirs:

Your recent changes to rules have the net effect of decreasing \$ Credits to Tesla Motor Company. Since Tesla Motor Company is the most innovative, most successful, and most meaningful advance to battery electric vehicle technology in our country, if not in the world, and since Tesla motor company is already effecting an improvement in California air quality, and since Tesla is already providing jobs to Californians and helping the California economy, your rule changes which cause decreased availability of \$ credits to Tesla are foolish and ill-advised. Tesla Motor Company is at an early stage in its development. You must give this company further financial incentives to allow it to thrive. This development takes time. We strongly protest your actions. We are ordinary California citizens. We are not shareholders of Tesla. We are not affiliated with Tesla in any way. We want you to do what is both right and smart for our State and our country. Weakening Tesla will only help our foreign competitors and enemies.

J. Block

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-07 13:10:18

No Duplicates.

## **Comment 4 for Zero Emission Vehicle Regulation 2013 (zev2013) - 15-1.**

First Name: Cor

Last Name: van de Water

Email Address: cor\_van\_de\_water@hotmail.com

Affiliation:

Subject: Fast Refueling credits

Comment:

I respectfully request the board to reconsider the change to the rules that only credits will be given for vehicles capable of refueling within 15 minutes, since this new requirement has no benefit for the air quality and it will lead to more peak load to the electric grid, so it will cause a problem that does not exist today with fast charging in the order of 1/2 hour period. It is the experience (of many Tesla drivers and a few other fast-charge capable vehicles) that a half hour recharge period is acceptable, since a typical rest period during a long range drive will be of the same time. Recharging an EV is not the same as refueling with liquid fuel that needs close observation and requires the presence of the driver or an attendant. Recharging an EV resembles the charging of a cell phone - nobody waits around until their phone is charged and nobody expect their phone to be fully charged up in 15 minutes and that is OK, since the user is not required to be present the whole recharge time. He or she can repose, eat, nap, go to the bathroom or even shop at the stores nearby the charging station while the EV is connected to the grid. The shortening of the charging time has no benefits and causes higher stresses on EV batteries and grid, making it more difficult to implement and thus hindering the availability of clean air vehicles that are so successful today, the EVs. I request you to remove the 15 minute limit for fast charging. Kind Regards,  
Cor van de Water  
EV driver,  
Sunnyvale, CA.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-10 23:59:42

No Duplicates.

## **Comment 5 for Zero Emission Vehicle Regulation 2013 (zev2013) - 15-1.**

First Name: gary

Last Name: kryztopik

Email Address: pelican640@yahoo.com

Affiliation:

Subject: ZEV

Comment:

This "minor" change appears to be an intentional hurdle thrown into the EV industry, which should have all of our support. There is no other single industry that can do so much for our current and future economic, environmental and overall energy benefit. The only reason to slow the growth of clean transportation is for the benefit of the oil industry. Shameful.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-11 08:47:50

No Duplicates.

## **Comment 6 for Zero Emission Vehicle Regulation 2013 (zev2013) - 15-1.**

First Name: Joe  
Last Name: Siudzinski  
Email Address: siudzinski@telis.org  
Affiliation:

Subject: Re: §1962.1  
Comment:

Re: §1962.1 Zero Emission Vehicle Standards for 2009 through 2017  
Model Year Passenger Cars, Light-Duty Trucks, and Medium Vehicles.  
ZEV Credits.

Fast Refueling, especially at the UDDS/time rates identified, is a metric that is irrelevant to Zero Emissions, and should not be part of the requirements. I am the owner of a number of 100%-Battery Electric Vehicles, and the vast majority of my charging is done overnight. The rest of the time I can comfortably live with a leisurely charge rate while doing something else. For most vehicles there are very few situations when high energy replacement rates are necessary, and, if needed, even those can be accommodated by appropriate (although expensive) high power sources, but not at the ridiculously-biased Fast Refueling rates identified in the Qualification for ZEV Multipliers and Credits. Please shift your paradigm away from the "gasoline station" concept - it belongs in the last century!

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2014-04-15 01:23:38

No Duplicates.

## **Comment 7 for Zero Emission Vehicle Regulation 2013 (zev2013) - 15-1.**

First Name: Julia

Last Name: Rege

Email Address: jrege@globalautomakers.org

Affiliation: Association of Global Automakers, Inc.

Subject: Global Automakers' Comments on ZEV2013; 15-Day Notice

Comment:

Comments submitted by the Association of Global Automakers, Inc. on the ZEV 15-Day Notice are attached.

Attachment: [www.arb.ca.gov/lists/com-attach/30-zev2013-VTJTOVI8VGVSNQFt.pdf](http://www.arb.ca.gov/lists/com-attach/30-zev2013-VTJTOVI8VGVSNQFt.pdf)

Original File Name: Global Automakers Comment\_15-Day ZEV Modifications\_4-18-2014 (ID 7232) (ID 7261).pdf

Date and Time Comment Was Submitted: 2014-04-18 10:48:01

No Duplicates.

## **Comment 8 for Zero Emission Vehicle Regulation 2013 (zev2013) - 15-1.**

First Name: Steven

Last Name: Douglas

Email Address: sdouglas@autoalliance.org

Affiliation: Alliance of Automobile Manufacturers

Subject: Alliance of Automobile Manufacturers - Recommendation on ZEV Regulation 15-Day Notice

Comment:

Attached is a letter from the Alliance of Automobile Manufacturers regarding the subject 15-Day Notice for minor amendments to the ZEV regulations.

Best regards,  
Steve

Attachment: [www.arb.ca.gov/lists/com-attach/31-zev2013-WzpUPIY7UGpWMQln.pdf](http://www.arb.ca.gov/lists/com-attach/31-zev2013-WzpUPIY7UGpWMQln.pdf)

Original File Name: Alliance ZEV 15-Day Notice Comment 18-Apr-2014.pdf

Date and Time Comment Was Submitted: 2014-04-18 12:10:17

No Duplicates.



## **Comment 9 for Zero Emission Vehicle Regulation 2013 (zev2013) - 15-1.**

First Name: Daniel

Last Name: Witt

Email Address: [dwitt@teslamotors.com](mailto:dwitt@teslamotors.com)

Affiliation: Tesla Motors, Inc

Subject: Comments re: Modified Text for the Minor Modification to the Zero Emission Vehicle Regs

Comment:

Please see the attached document for comments from Tesla Motors, Inc.

Attachment: [www.arb.ca.gov/lists/com-attach/32-zev2013-UmAHMQMzUzRRZ1Vh.pdf](http://www.arb.ca.gov/lists/com-attach/32-zev2013-UmAHMQMzUzRRZ1Vh.pdf)

Original File Name: 20140418 Tesla Fast Refueling Comments.pdf

Date and Time Comment Was Submitted: 2014-04-18 14:18:00

No Duplicates.

## **Comment 1 for Zero Emission Vehicle Regulation 2013 (zev2013) - 15-2.**

First Name: Ken

Last Name: Morgan

Email Address: kmorgan@teslamotors.com

Affiliation: Tesla Motors Inc

Subject: Tesla Comments

Comment:

Attached are Tesla's comments to the proposed amendments to Section 1962.1, Title 13, California Code of Regulations

Attachment: [www.arb.ca.gov/lists/com-attach/33-zev2013-VmRUYIBgUjVVYwg9.pdf](http://www.arb.ca.gov/lists/com-attach/33-zev2013-VmRUYIBgUjVVYwg9.pdf)

Original File Name: 20140522 Tesla Comments to Revised Fast Refueling Amendment.pdf

Date and Time Comment Was Submitted: 2014-05-22 12:18:14

No Duplicates.

## **Comment 2 for Zero Emission Vehicle Regulation 2013 (zev2013) - 15-2.**

First Name: Jim

Last Name: Ehlmann

Email Address: james.ehlmann@gm.com

Affiliation:

Subject: GM Comments

Comment:

See attached.

Attachment: [www.arb.ca.gov/lists/com-attach/35-zev2013-BWJQOwRaUmIAaQBt.pdf](http://www.arb.ca.gov/lists/com-attach/35-zev2013-BWJQOwRaUmIAaQBt.pdf)

Original File Name: GM Comments.pdf

Date and Time Comment Was Submitted: 2014-05-23 12:08:56

No Duplicates.

### **Comment 3 for Zero Emission Vehicle Regulation 2013 (zev2013) - 15-2.**

First Name: Steven

Last Name: Douglas

Email Address: sdouglas@autoalliance.org

Affiliation: Alliance of Automobile Manufacturers

Subject: Alliance and Global - Recommendations on ZEV Regulation 2nd 15-Day Notice  
Comment:

Attached are the comments of the Alliance of Automobile  
Manufacturers and Association of Global Automakers on the proposed  
changes in the subject regulations.

Best regards,  
Steve Douglas

Attachment: [www.arb.ca.gov/lists/com-attach/36-zev2013-VGZQZIJiAmVXfAMz.pdf](http://www.arb.ca.gov/lists/com-attach/36-zev2013-VGZQZIJiAmVXfAMz.pdf)

Original File Name: 2014-05-23 Alliance and Global Letter on 2nd 15-Day Notice.pdf

Date and Time Comment Was Submitted: 2014-05-23 14:19:34

No Duplicates.

## **Comment 4 for Zero Emission Vehicle Regulation 2013 (zev2013) - 15-2.**

First Name: David

Last Name: Reichmuth

Email Address: dreichmuth@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: UCS and NRDC comments

Comment:

Attached are UCS and NRDC comments on the proposed ZEV amendments.

Attachment: [www.arb.ca.gov/lists/com-attach/37-zev2013-UigCYQN0V1tWIAV3.pdf](http://www.arb.ca.gov/lists/com-attach/37-zev2013-UigCYQN0V1tWIAV3.pdf)

Original File Name: ZEV Program Comments\_v2.pdf

Date and Time Comment Was Submitted: 2014-05-23 16:43:24

No Duplicates.

## **Comment 5 for Zero Emission Vehicle Regulation 2013 (zev2013) - 15-2.**

First Name: Robert

Last Name: Bienenfeld

Email Address: robert\_bienenfeld@ahm.honda.com

Affiliation: American Honda Motor Co., Inc.

Subject: Honda Comments on Second 15-Day Notice

Comment:

Please see attached

Attachment: [www.arb.ca.gov/lists/com-attach/38-zev2013-VDwGb1I9WW4DZFMm.pdf](http://www.arb.ca.gov/lists/com-attach/38-zev2013-VDwGb1I9WW4DZFMm.pdf)

Original File Name: Honda Comments on 2nd 15 Day Notice Amendments to Section 1962.1.pdf

Date and Time Comment Was Submitted: 2014-05-23 16:47:07

No Duplicates.