



Promoting plug-in cars, trucks and SUVs powered by cleaner, cheaper, domestic electricity to reduce our nation's dependence on petroleum and improve the global environment.

18 January 2008

ETAAC
c/o Steve Church <schurch@arb.ca.gov>
Research Division
California Air Resources Board
1001 I Street, PO Box 2815
Sacramento, CA 95812

Re: ETAAC Discussion Draft 12/21/2007, Appendix IV

Dear Mr. Church,

In our second comment, we would like to commend the ETAAC for the proposal for in "II. Financial Sector", recommendation "E. Fee and Tax Shifting (Feebates)" and in particular the proposal for a feebate at vehicle purchase time, which we believe the best time to influence consumer vehicle choices while educating them about the importance of their decision. The lifecycle GHG reductions of PHEVs and BEVs would stand out under such a program.

We do believe that "Section 3 Transportation Sector" subsection "IV. Improving Vehicle GHG Performance" could be improved by adding similar PHEV and BEV education and incentives.

Section 3.IV.F on page 3-26 says "This effort should start immediately and targets should be set with the ultimate goal of implementing 100 percent Zero Emission Vehicles (ZEV) by 2035." We believe 2035 is far too late of a goal for mere demonstrations. The chart on page 3-22 makes it clear that multiple ZEV technologies will be available for demonstration in the 2018 timeframe. Demonstrations must lead volume purchases, and to volume purchases must reach a high percentage of vehicle sales by 2035 to have a significant impact by 2050.

We believe 2018 is more than an appropriate goal for ZEV demonstrations, as the technology for ZEVs is already old, and only production is required." We also believe this paragraph should mention BEVs in parallel with "hydrogen fuel cell cars". Both should be part of fleets in 2018, in keeping with the ETAAC's "Level Playing Field" goal.

Sincerely,

Jay Friedland
Legislative Director
Plug In America