

Comment 1 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Rudy

Last Name: Tapia

Email Address: Rudy@VisionMotorCorp.com

Affiliation:

Subject: Request to Earn ZEV Credits

Comment:

Vision Motor Corp of El Segundo, California is requesting the ability of our zero emission class 8 heavy-duty truck (Tyrano)to earn ZEV Credits.

Attachment: www.arb.ca.gov/lists/zev2012/2-arb_zev_letter_12-12-11.docx

Original File Name: ARB ZEV Letter 12-12-11.docx

Date and Time Comment Was Submitted: 2011-12-14 14:15:57

No Duplicates.

Comment 2 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: dan

Last Name: Mars

Email Address: dmsail@gmail.com

Affiliation:

Subject: ZEV

Comment:

I am very much in favor of feebates to encourage the use of plug-in hybrid, and all-electric vehicles. Charge a fee for inefficient vehicles and use that money to give rebates to buyers of clean vehicles that plug-in. There are many advantages for the individuals as well as society as a whole.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-19 15:12:32

No Duplicates.

Comment 3 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Susan

Last Name: Shields

Email Address: shields3033@netscape.net

Affiliation:

Subject: Uphold new ZEV standard

Comment:

Auto companies may be fighting the proposed ZEV standard, but it is vital to update and stick to stringent emissions standards in order to promote zero-emissions technology and force auto manufacturers to improve their designs. Once the cost of electric cars is reduced, more of them will be purchased. We need 2 million new clean cars on the road by 2025. This will not happen unless state government demands it.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-20 15:27:21

No Duplicates.

Comment 4 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Stephen
Last Name: Greenberg
Email Address: sgberg@pacbell.net
Affiliation:

Subject: Please adopt strong ZEV standard
Comment:

Clerk, Chair Nichols, & Board -

I'm among the anxious majority of Californians, seriously alarmed at the threat and impact of climate change. We all need to be taking affirmative action to address that problem; you folks just happen to be in a particularly hot seat. I.e., you happen to have a hot opportunity. Please, please adopt the strongest possible Zero Emissions Vehicle standard for new cars sold through 2025. Where CA leads, the US will almost certainly follow. Let's lead the way to a zero-emissions near-future.

Thank you.

- Stephen Greenberg
14 Turpentine Drive
Nevada City, CA 95959
(530) 265-3696
sgberg@pacbell.net

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-20 16:24:47

No Duplicates.

Comment 5 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Laural F.

Last Name: Reid

Email Address: Non-web submitted comment

Affiliation: CREDO

Subject: Form Letter # 1

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/7-credo.pdf

Original File Name: CREDO.pdf

Date and Time Comment Was Submitted: 2011-12-27 09:23:10

1075 Duplicates.

Comment 6 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Jane

Last Name: Illades

Email Address: lillades@cox.net

Affiliation:

Subject: ZEV standard

Comment:

I urge Chair Mary Nichols to set a standard for ZEV that is stringent enough to put at least 1.8 million NEW electric cars on the road from 2018 to 2025. Auto makers need to be forced to invest more in zero-emissions technology, and lower the cost of clean cars.

Thank you for listening and carrying out this all-important step towards cleaner air! I'm sure that if we do this, other states will follow our lead.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-30 14:26:12

No Duplicates.

Comment 7 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: david

Last Name: perry

Email Address: Perryburg@gmail.com

Affiliation:

Subject: new law

Comment:

Don't be draconian with the regs We can still have our autos and not have to rely only on electric cars as they pollute too just in a different way. Please remember this point as your making your vote look like a shell game

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-01-03 09:02:42

No Duplicates.

Comment 8 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Union
Last Name: Consumer
Email Address: nadjawest2@yahoo.com
Affiliation: Advocacy

Subject: Form Letter # 2
Comment:

Jan 2, 2012

Chairman Mary Nichols
CA

Dear Chairman Nichols,

I urge you to vote "yes" on the strongest possible Advanced Clean Cars Program standards at your January board meeting.

I have COPD and have never smoked, nor worked at any job dealing with chemicals. I was born in and have lived in California my entire life.

Integrity is infinitely more important than money, including keeping one's job by sucking up to special interests at odds with people.

Strong clean car standards protect consumers and drive innovation in efficiency, pollution reduction, and alternate fuels. The result is cleaner, more efficient cars that help reduce America's vulnerability to oil and gasoline price shocks.

California air quality is shockingly bad, and consumers are wasting billions of dollars on gasoline. Moving forward with a robust Advanced Clean Cars Program solves both problems by cleaning up pollution from vehicles and lowering consumer fuel costs and putting the money to better use.

Thank you for considering my views.

Sincerely

Mrs. Nadja West
40322 Poppy Dr
Hemet, CA 92544-7372
(951) 929-2858

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-01-03 12:29:03

4493 Duplicates.

Comment 9 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Peter

Last Name: Klosterman

Email Address: petek@accesscom.com

Affiliation: Union of Concerned Scientists (member)

Subject: Please work for strong vehicle emission controls

Comment:

I am a California resident with a strong science background, including a Ph.D. in Molecular Biophysics from Yale University, and have followed with great interest the scientific literature and recent developments in our understanding of climate change. There is no doubt that human introduced factors are leading to an unprecedented situation that demands changes in our emissions.

I strongly support the proposed vehicle and fuel policies to cut vehicle pollution, guarantee consumer access to clean fuels, and foster development of zero-emission technology. I urge you to strengthen the requirement for battery, fuel cell, and plug-in hybrid electric vehicles, to 1.8 million new vehicle sales in California between 2018 and 2025, as proposed by the Union of Concerned Scientists.

Thanks for this inspiring program of clean car standards.

Sincerely,

Peter Klosterman, Ph.D.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-01-05 21:24:52

No Duplicates.

Comment 10 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Robert
Last Name: Conibear
Email Address: racbear@gmail.com
Affiliation: Engineer,Ret'd, Oil&Gas Industry

Subject: Advanced Clean Cars
Comment:

I am concerned that the Board has lost some focus that being too tied to the detail clouds the objective. The objective being to reduce GHG's in the quickest possible time and to do so in the most efficient manner energy and cost-wise.

You are correct in that PHEV's and ZEV's are the means to the objective so why not define each of these then address the time line. Use energy efficiency as the base criteria with rewards for greater efficiencies and penalties for less.

There are 11 auto companies that now or are near to production PHEV's but less for BEV's. There is no reason to delay an aggressive standard and time line as the technology and products are in place. Remember that these will follow your lead but you can also follow and update your standard as both change.

However to be effective the timeline cannot be ignored. The auto companies do not have aggressive production schedules for these vehicles nor, as a result are the vehicles reasonably priced therefore it will take a long time without incentive to replace the existing vehicles.

I proposed a method to Barbara Boxer which I have added below which shows a way to do this quickly. Basically the user pays into a fund that is used to guarantee purchase of vehicles to auto companies then is used to discount the purchase price. The numbers shown are for the USA overall but the outcome is for an 80% fuel reduction in ten years and shows the longer term benefits to the economy as a whole.

Regards,
Bob Conibear

email to Barbara, 12 Dec 2011.

Barbara, here is how to gain complete independence from foreign oil supplies while reducing Green House Gases substantially and substantially increasing per capita discretionary spending.

GOALS-----Reduce fuel consumption by 80% in ten years
(9Mbbbl/d to 1.8)

-----Corresponding crude oil reduction from 15Mbbbl/d to 3Mbbbl/d

-----Corresponding reduction in GHG's

-----Increase Discretionary Spending by \$907.2 million daily!!!

(9Mbbbl/d minus 1.8, times 42 gallons /bbl, times \$3/gal)

IDENTIFY DIFFICULTY-----availability of low cost energy efficient vehicles

SOLUTION-----Set up an independent non-profit fund to guarantee loans to order large quantities of vehicles that use little fuel or no fuel, and guarantee assembly line production of vehicles that meet the defined standard. Spend the fund on rebates, added, replacing and/or superseding the present rebates. Pay for the fund by usage fee on each gallon of gasoline thereby making the users pay for fuel efficient vehicles and reward them and the country by low to nil future costs of fuel with the new vehicle at no extra capital costs to the buyer. No more studies, experimental funding, etc, just buy them!

Here are the numbers:

9 million barrels fuel per day, current use---137,970 million gallons per year

User Fee at \$.50/gal-----\$68,985 million per year

Rebate per vehicle,say \$7000, number of vehicles-----9.855 million per year

Present new vehicles purchased yearly,-----13 million per year

DEFINED STANDARD-----Independently set up general standard based on efficiency of the drive system. Here are basic criteria:

Driver-----

Electric Motor efficiency-----90%

Diesel Engine efficiency-----32.5%

Gasoline(spark ignition) engine efficiency-----25%

Fuel savings compared to spark ignition engines:

All Electric (battery)-----100%

Plug-In Hybrids-----+80%

Hybrid (Parallel drives)-----50%

Hybrid (Series drives)-----40%

Diesel-----30%

Gasoline, ethanol, Nat Gas-----0%

Fuelcell----depends on type-----?

VEHICLES AVAILABLE-----Most major auto makers (11) produce PHEV's, or are about to produce but with limited production. Reserve production of two million vehicles from five and get a good price!! Run,do not walk!!

There are of course many variables pro and con, going on this course or any course for that matter and having been in the Oil and Gas Industry as an engineer all my working life I have a lot more info should this be of interest to you. Please note that the oil companies and the auto companies are reluctant to change their ways on this since it will greatly affect their short term bottom line and change the industry forever.

Regards,
Robert A Conibear

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2011-12-13 12:49:51

No Duplicates.

Comment 11 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Eric

Last Name: Lerner

Email Address: elerner@hcwh.org

Affiliation:

Subject: Cleaner Cars in California

Comment:

As a citizen of California and parent, I strongly support California's efforts to reduce air pollutants and greenhouse gases from motor vehicles and urge the State of California to continue its national and international leadership in promoting clean vehicle policies and technologies. Without strong action to reduce emissions, global warming will exacerbate our existing air pollution-related public health crisis. We are deeply concerned about the poor health outcomes caused by air pollution that is driven largely by transportation emissions in California. Along with triggering asthma attacks, exposure to vehicle pollution contributes to new asthma cases, impairs lung function and development and contributes to respiratory and cardiac illnesses and even premature deaths. Global warming will add to these burdens as higher temperatures lead to reduced air quality, more intense heat waves, increased wildfire smoke exposure and other public health challenges. We are especially concerned about low-income communities and other vulnerable populations including seniors, children and infants and those already suffering from lung, heart and other chronic diseases. We support the leadership of the State of California in its ongoing efforts to implement policies and programs that reduce greenhouse gas emissions while also advancing public health, air quality and environmental goals. We urge the California Air Resources Board to move forward this year to protect public health by enhancing California's Low Emission Vehicle (LEV) criteria pollutant and greenhouse gas regulations to reduce emissions from all new motor vehicles and by strengthening the state's Zero Emission Vehicle (ZEV) program. We believe that the strongest possible motor vehicle emission standards are critically important for the health of California residents and, as other states and the federal government adopt California vehicle standards, for the health of all Americans.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-01-11 13:23:02

No Duplicates.

Comment 12 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Michael

Last Name: Lee

Email Address: mhlee88@sbcglobal.net

Affiliation:

Subject: Vehical Emission Regulation

Comment:

Vehicle emission is a sizable contributor to global warming. Signs of global warming are everywhere. Look no farther than the current drought in California. The fear is that this is not a one year aberation, but a long term trend. The cost of doing nothing is enormous. What happens if Santa Barbara burns every year due to the lack of rain? The list goes on and on. Do what we can now to stem global warming.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-01-12 09:13:22

No Duplicates.

Comment 13 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Association
Last Name: American Lung
Email Address: lungaction@lung.org
Affiliation: in California Supporters

Subject: Form Letter # 3
Comment:

Jan 12, 2012

Chairman Nichols
1001 I Street
Sacramento, CA 95812

Dear Chairman Nichols,

I am writing to support strengthening the "advanced clean cars" proposal to increase the numbers of Zero Emission Vehicles on California roads. Too many people are suffering from the burden of dirty air in California, especially those with existing respiratory ailments like asthma, as well as children and the elderly. The car companies must step up their production of cleaner vehicles and especially battery electric and hydrogen fuel cell vehicles. People in my community need clean vehicle choices.

I urge you to adopt the highest possible requirements for zero emission vehicle technology and believe that the ZEV program is necessary to achieving clean, healthy air in California for generations to come. While the proposed rule is targeting 1.4 million vehicles, the Air Board should push for a stronger ZEV program target of 2 million electric-drive vehicles by 2025. I also strongly support the "Clean Fuels Outlet" program to require oil companies to provide alternative fuels.

A strong clean cars program can prevent thousands of asthma attacks and save billions of dollars each year in health care costs, according to American Lung Association in California. Thank you for maintaining California's leadership in the fight for cleaner, healthier air.

Sincerely,

Mr. Jack Frost
4253 Meadow Lark Dr
Calabasas, CA 91302-1848

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-01-13 10:37:23

664 Duplicates.

Comment 14 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Clean Air

Last Name: Coalition for

Email Address: aaron@coalitionforcleanair.org

Affiliation:

Subject: Form Letter # 4

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/19-coalition_for_clean_air.pdf

Original File Name: Coalition for Clean Air.pdf

Date and Time Comment Was Submitted: 2012-01-13 15:16:22

12 Duplicates.

Comment 15 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Defense Council
Last Name: Natural Resources
Email Address: tessaw@mindspring.com
Affiliation: Members

Subject: Form Letter # 5
Comment:

Dear California Air Resources Board members,

I applaud and support your leadership in setting the next round of clean car standards that will protect the air we breathe from smog, dangerous air toxics and carbon pollution. Thanks to your leadership, in partnership with the U.S. Environmental Protection Agency, the rest of the nation will now also benefit from California's trailblazing efforts to make gasoline vehicles cleaner.

The job is not done, however. California still suffers from the nation's smoggiest air and continued high oil prices. To ensure every Californian can breathe healthy air in the future and to protect our economy, we must ultimately eliminate our dependency on oil.

That's why I urge you to adopt the strongest possible requirement for the auto industry to produce increasing numbers of advanced technology, plug-in electric cars. The board should strengthen staff's proposed requirements so that they result in nearly two million electric cars in California by 2025. Simultaneously, the board should reject the loopholes being proposed by some automakers; one such loophole could undermine requirements by as much as 40 percent for an automaker.

Instead, let's help ensure that automakers are investing to make zero-emission technologies as ubiquitous as air bags and catalytic converters. By adopting strong standards, you will be protecting public health, expanding vehicle choices and helping create thousands of new jobs producing zero-emission

Tessa woodmansee
641 stockton ave
San Jose, ca 95126

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-01-17 12:08:55

1999 Duplicates.

Comment 16 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Jessica

Last Name: Tovar

Email Address: Non-web submitted comment

Affiliation:

Subject: Long Beach Alliance for Children with Asthma

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/27-jessica_tovar.pdf

Original File Name: Jessica Tovar.pdf

Date and Time Comment Was Submitted: 2012-01-20 08:59:38

No Duplicates.

Comment 17 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: John

Last Name: Cabaniss

Email Address: jcabaniss@globalautomakers.org

Affiliation: Association of Global Automakers

Subject: ZEV2012

Comment:

Attached is a letter providing comments on the Advanced Clean Cars regulatory package, including ZEV2012.

Attachment: www.arb.ca.gov/lists/zev2012/28-arb_advanced_clean_cars_comments_1.20.2012.pdf

Original File Name: ARB Advanced Clean Cars Comments 1.20.2012.pdf

Date and Time Comment Was Submitted: 2012-01-20 10:53:44

No Duplicates.

Comment 18 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Barbara B.

Last Name: Hines

Email Address: Non-web submitted comment

Affiliation:

Subject: Queens Care Family Clinic

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/29-barbara.pdf

Original File Name: Barbara.pdf

Date and Time Comment Was Submitted: 2012-01-20 13:31:15

No Duplicates.

Comment 19 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Summer

Last Name: Pennino

Email Address: summer.pennino@evi-usa.com

Affiliation:

Subject: Medium Duty ZEV Comments

Comment:

EVI would like to submit the attached letter as comments into the public record.

Thank you,
Summer

Attachment: www.arb.ca.gov/lists/zev2012/31-zev_letter_011912.pdf

Original File Name: ZEV Letter 011912.pdf

Date and Time Comment Was Submitted: 2012-01-20 15:47:44

No Duplicates.

Comment 20 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Emily

Last Name: Schneider

Email Address: eschneider@pecg.org

Affiliation: Professional Engineers in CA Government

Subject: Adoption of the Clean Car Standards

Comment:

Please see the attachment.

Attachment: www.arb.ca.gov/lists/zev2012/32-12_0120_clean_car_standards_testimony_-_final_hearing.pdf

Original File Name: 12 0120 Clean Car Standards Testimony - Final Hearing.pdf

Date and Time Comment Was Submitted: 2012-01-20 16:52:29

No Duplicates.

Comment 21 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Lydia

Last Name: Alegria

Email Address: lydiaalegria@sbcglobal.net

Affiliation:

Subject: Zero Emissions Vehicle Program

Comment:

Hello,

I have a mechanical engineering degree from UC Berkeley and am a member of the technical staff for LADWP.

First, I would like to applaud you for all your policies that would result in dramatic reductions in heat-trapping emissions and air pollution while reducing our dependence on oil. Your vision will make California the leader in a more sustainable future.

After researching the issue, I feel we need to increase the number of vehicles. I support the proposed changes to the Zero Emissions Vehicles program while urging the California Air Resources Board officials to strengthen the proposal by raising the requirement for battery, fuel cell, and plug-in hybrid electric vehicles to account for 1.8 million new vehicle sales in the state between 2018 and 2025.

Thank you for your leadership and vision,
Lydia Alegria

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-01-22 15:16:08

No Duplicates.

Comment 22 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Charles

Last Name: Ross

Email Address: charles.ross@cox.net

Affiliation:

Subject: "advanced clean cars" proposal

Comment:

I am writing to OPPOSE strengthening the "advanced clean cars" proposal to increase the numbers of Zero Emission Vehicles on California roads. FALSE SCIENCE is being used by the Lung Association and others to fool the populace. Electric cars are essentially coal-powered and this measure increases, rather than reduces, net air pollution.

PLEASE REJECT strengthening the "advanced clean cars" proposal.

Charles Ross
13316 Frame Road
Poway, CA 92064

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-01-23 11:33:12

No Duplicates.

Comment 23 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: klaus

Last Name: Land

Email Address: william.craven@daimler.com

Affiliation:

Subject: LEV III, CFO and ZEV testimony

Comment:

Klaus Land would like to testify on LEV III, CFT and ZEV at the board hearing. Attached is hid testimony.

Attachment: www.arb.ca.gov/lists/leviiighg2012/17-klaus_land_testimony_1-26-2012.doc

Original File Name: Klaus land testimony 1-26-2012.doc

Date and Time Comment Was Submitted: 2012-01-23 13:34:31

No Duplicates.

Comment 24 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Anne

Last Name: Kelsey Lamb

Email Address: anne@rampasthma.org

Affiliation: Regional Asthma Management and Preventio

Subject: Support for Advanced Clean Cars

Comment:

Please see the attached letter of support.

Attachment: www.arb.ca.gov/lists/zev2012/36-ramp_clean_cars_los.pdf

Original File Name: RAMP Clean Cars LOS.pdf

Date and Time Comment Was Submitted: 2012-01-23 15:08:56

No Duplicates.

Comment 25 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Anne

Last Name: Kelsey Lamb

Email Address: anne@rampasthma.org

Affiliation: Community Action to Fight Asthma

Subject: Support for Advnaced Clean Cars

Comment:

See attached letter of support on behalf of Community Action to Fight Asthma.

Attachment: www.arb.ca.gov/lists/zev2012/37-cafa_clean_cars_los.pdf

Original File Name: CAFA Clean Cars LOS.pdf

Date and Time Comment Was Submitted: 2012-01-23 15:08:56

No Duplicates.

Comment 26 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Ken

Last Name: McEldowney

Email Address: ken.mceldowney@consumer-action.org

Affiliation: Consumer Action

Subject: Consumer groups offer support for CA Clean Cars Program

Comment:

Please accept the attached comments on behalf of consumer groups.

Attachment: www.arb.ca.gov/lists/zev2012/38-lowincome-minority_letter_to_carb_1-17-12final_.pdf

Original File Name: LowIncome-Minority Letter to CARB 1-17-12FINAL*.pdf

Date and Time Comment Was Submitted: 2012-01-23 15:17:14

No Duplicates.

Comment 27 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Jack

Last Name: Gillis

Email Address: jack@jagillis.com

Affiliation:

Subject: Consumer experts offer support for a strong Clean Cars Program

Comment:

Please accept the attached letter of support from Consumer Federation of America, Consumers Union and Consumers for Auto Reliability and Safety.

Attachment: www.arb.ca.gov/lists/zev2012/39-cu_cfa_cars_letter_to_carb_1-17-12-final.pdf

Original File Name: CU:CFA:CARS Letter to CARB 1-17-12-FINAL.pdf

Date and Time Comment Was Submitted: 2012-01-23 18:42:05

No Duplicates.

Comment 28 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 29 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Felisa

Last Name: Amedeo

Email Address: Non-web submitted comment

Affiliation:

Subject: Ferrari S.p.A.

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/41-ferrari.pdf

Original File Name: Ferrari.pdf

Date and Time Comment Was Submitted: 2012-01-24 11:06:51

No Duplicates.

Comment 30 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Giacomo

Last Name: Mattioli

Email Address: Non-web submitted comment

Affiliation:

Subject: Ferrari of Beverly Hills

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/42-beverly_hills.pdf

Original File Name: Beverly Hills.pdf

Date and Time Comment Was Submitted: 2012-01-24 11:12:55

No Duplicates.

Comment 31 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Greg

Last Name: Minor

Email Address: Non-web submitted comment

Affiliation:

Subject: Ferrari of San Francisco

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/43-san_francisco.pdf

Original File Name: San Francisco.pdf

Date and Time Comment Was Submitted: 2012-01-24 11:12:55

No Duplicates.

Comment 32 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Anca

Last Name: Faur-Ghenciu

Email Address: ghencia@jmusa.com

Affiliation: Johnson Matthey Fuel Cells

Subject: ZEV / CFO regulatory changes

Comment:

Attached is a letter of support from Johnson Matthey Fuel Cells on ZEV and CFO regulation.

Attachment: www.arb.ca.gov/lists/zev2012/45-jmfc_letter_of_support_-_zev_regulation_jan2012.pdf

Original File Name: JMFC letter of support - ZEV Regulation_Jan2012.pdf

Date and Time Comment Was Submitted: 2012-01-24 11:35:46

No Duplicates.

Comment 33 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Jim

Last Name: Ehlmann

Email Address: james.ehlmann@gm.com

Affiliation:

Subject: General Motors

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/48-gm.pdf

Original File Name: GM.pdf

Date and Time Comment Was Submitted: 2012-01-24 12:35:53

No Duplicates.

Comment 34 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Matt

Last Name: Sloustcher

Email Address: msloustcher@codaautomotive.com

Affiliation: CODA Automotive

Subject: Advanced Clean Car Regulations

Comment:

Although we support the proposed amendments in concept, and applaud the staff for its efforts, we believe that the program can be further strengthened, with slight modifications, to ensure that the best interests of California residents and businesses are considered.

CODA Proposed Amendments:

1. Maintain Carry Forward Provision For Lower Tier Credits
2. Eliminate or Cap the Federal Over-compliance Pathway
3. Expand Current or Develop Third-Party ZEV Credit Market

Attachment: www.arb.ca.gov/lists/zev2012/50-coda_comments.pdf

Original File Name: CODA Comments.pdf

Date and Time Comment Was Submitted: 2012-01-24 12:42:02

No Duplicates.

Comment 35 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Sara

Last Name: Rudy

Email Address: srudy@ford.com

Affiliation:

Subject: Large Volume Manufacturer Detail Comments

Comment:

The attached is submitted on behalf of the large volume manufacturers, including BMW of North America LLC (transitioning LVM), Chrysler LLC, Ford Motor Company, General Motors Corporation, Honda Motor Company, Inc., Mercedes Benz (transitioning LVM), Nissan North America, Inc., and Toyota Motor North America, Inc.

Attachment: www.arb.ca.gov/lists/zev2012/51-lvm_zev_detail_comments_final.pdf

Original File Name: LVM ZEV Detail Comments Final.pdf

Date and Time Comment Was Submitted: 2012-01-24 12:44:37

No Duplicates.

Comment 36 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Wendy

Last Name: James

Email Address: wendy@betterworldgroup.com

Affiliation:

Subject: UPDATED: Nationwide advocates - support for ZEV and comments

Comment:

See the attached letter.

Attachment: www.arb.ca.gov/lists/zev2012/52-states_advocates_on_zev_-_final.pdf

Original File Name: States advocates on ZEV - final.pdf

Date and Time Comment Was Submitted: 2012-01-24 12:47:28

No Duplicates.

Comment 37 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Barbara

Last Name: Nocera

Email Address: bnocera@mazdausa.com

Affiliation: Mazda North American Operations

Subject: Comments regarding 2012ZEV Amendments

Comment:

Thank you for your consideration of our comments.

Attachment: www.arb.ca.gov/lists/zev2012/53-mazda_comments_to_carb_for_clean_cars_isor.pdf

Original File Name: Mazda Comments to CARB for Clean Cars ISOR.pdf

Date and Time Comment Was Submitted: 2012-01-24 12:37:58

No Duplicates.

Comment 38 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Robert

Last Name: Summers

Email Address: bsummers@mde.state.md.us

Affiliation: Maryland Department of the Environment

Subject: ZEV 2012 Amendments

Comment:

Please see corresponding attachment.

Attachment: www.arb.ca.gov/lists/zev2012/55-zev.pdf

Original File Name: ZEV.pdf

Date and Time Comment Was Submitted: 2012-01-24 13:30:13

No Duplicates.

Comment 39 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Yolanda

Last Name: Cuevas

Email Address: Non-web submitted comment

Affiliation:

Subject: Los Angeles Unified School District Asthma Program

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/56-yolanda.pdf

Original File Name: Yolanda.pdf

Date and Time Comment Was Submitted: 2012-01-24 14:20:59

No Duplicates.

Comment 40 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Sara

Last Name: Rudy

Email Address: srudy@ford.com

Affiliation: Ford Motor Company

Subject: Ford Comments on ZEV / CFO Proposal

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/57-ford_comments_2012_01_24.pdf

Original File Name: Ford comments 2012_01_24.pdf

Date and Time Comment Was Submitted: 2012-01-24 14:19:31

No Duplicates.

Comment 41 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Erin
Last Name: Tator
Email Address: erintator@sbcglobal.net
Affiliation:

Subject: Don't approve the overcompliance provision
Comment:

Dear Ms. Nichols and the CARB Board,

We strongly urge you to close a gaping loophole that could deal a blow to the proliferation of plug-in vehicles just as we are starting to see real volume production. We urge you not to approve the proposed "overcompliance" provision which would dramatically weaken the California ZEV program allowing automakers that 'overcomply' with the new Federal GHG standards to get away with producing fewer EVs. This provision allows an automaker to cut the number of pure electric-drive vehicles by as much as 50% over the 2018 to 2021 timeframe in exchange for just 2 g/ mile GHG overcompliance during that time. This is a bad deal for California and for the United States!

Honda, Hyundai, and Toyota are once again trying to game the system. Please don't let them do this, especially as we see the great progress made by Nissan, GM, Ford, Tesla, Coda, and other OEMs truly committed to building a real sustainable business around electric vehicles.

You must close this loophole and not approve the proposed overcompliance provision, so that California will continue to drive high volumes of plug-in vehicles and the CARB board doesn't further weaken the ZEV mandate.

Signed,

Erin Tator
155 Mesa Verde St
Vallejo, CA 94589

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-01-24 15:58:21

No Duplicates.

Comment 42 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Frank
Last Name: Krich
Email Address: fak6@chrysler.com
Affiliation: Chrysler

Subject: Chrysler LEV III and ZEV Comments
Comment:

Attached you will find Chrysler's comments on California's proposed LEV III and ZEV regulations.

Attachment: www.arb.ca.gov/lists/zev2012/61-chrysler_lev_iii_and_zev_comments_01.24.12.docx

Original File Name: Chrysler LEV III and ZEV Comments 01.24.12.docx

Date and Time Comment Was Submitted: 2012-01-24 16:40:19

No Duplicates.

Comment 43 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Jessica

Last Name: Tovar

Email Address: jessicatovar2@gmail.com

Affiliation:

Subject: Clean Cars Campaign

Comment:

My name is Jessica Tovar and I am the Project Manager for the Long Beach Alliance for Children with Asthma (LBACA) and I want to express my strong support for the California Clean Cars Campaign. We are deeply concerned about the poor health outcomes caused by air pollution that is driven largely by transportation emissions in California. LBACA assists children and families with poorly controlled asthma. In our work we see the high utilization of emergency department services, missed school days which means lost school learning time, parental work time, additional doctor's visits, medications and general stress for the affected families.

Despite advances in improving air quality, Long Beach and its surrounding communities will likely continue to experience the disproportionate impact of asthma and other health conditions resulting from poor air quality. The short and long term effects of exposure to high levels of ambient air pollution on children is a major concern based on the large body of research documenting associations between exposure to pollution from traffic related sources and asthma.

Stronger clean car standards will assist in cleaning up the air and protecting the health of the children we serve every day at the Long Beach Alliance for Children with Asthma. We urge the California Air Resources Board to move forward in protecting public health. Thank you.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-01-24 17:27:43

No Duplicates.

Comment 44 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Michael

Last Name: Lord

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

Affiliation:

Subject: Large Volume Manufacturer ZEV Letter to the Board

Comment:

Please find attached the above mentioned letter submitted on behalf of the Large Volume Manufacturers. The Large Volume Manufacturers are BMW of North America, LLC (transitioning LVM), Chrysler Group LLC, Ford Motor Company, General Motors Company, Honda Motor Company, Inc., Mercedes Benz (transitioning LVM), Nissan North America, Inc., and Toyota Motor North America, Inc.

Attachment: www.arb.ca.gov/lists/zev2012/65-lvm_zev_comments.pdf

Original File Name: LVM ZEV Comments.pdf

Date and Time Comment Was Submitted: 2012-01-24 23:06:17

No Duplicates.

Comment 45 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Thomas

Last Name: Jordan

Email Address: tom.jordan@valleyair.org

Affiliation: San Joaquin Valley APCD

Subject: SJVAPCD Resolution of Support

Comment:

See Attached Resolution.

Attachment: www.arb.ca.gov/lists/zev2012/67-sjvapcd_clean_cars_resolution.pdf

Original File Name: SJVAPCD Clean Cars Resolution.pdf

Date and Time Comment Was Submitted: 2012-01-25 08:21:24

No Duplicates.

Comment 46 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Shannon
Last Name: Baker-Branstetter
Email Address: bakesh@consumer.org
Affiliation: Consumers Union

Subject: Consumers Union's comments on Advanced Clean Cars rules
Comment:

Please see attached for Consumers Union's comments and survey report.

Attachment: www.arb.ca.gov/lists/zev2012/68-cu_comments_to_carb.zip

Original File Name: CU Comments to CARB.zip

Date and Time Comment Was Submitted: 2012-01-25 08:07:28

No Duplicates.

Comment 47 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Ed
Last Name: Pike
Email Address: ed@theicct.org
Affiliation: ICCT

Subject: clean cars regulations
Comment:

ICCT strongly supports CARB's proposed update to the Zero Emission Vehicle (ZEV), Low Emission Vehicle (LEV), and Clean Fuels Outlet (CFO) programs and we commend CARB for its national and international leadership on advanced technology development, conventional pollutant control and greenhouse gas reduction.

We agree with CARB's ZEV upstream emissions accounting proposal in the LEV III greenhouse gas standards, and staff efforts to explore regulatory and non-regulatory options for hydrogen infrastructure deployment. We encourage CARB to cap the potential reduction of ZEV targets through automakers' "overcompliance" with federal GHG standards and to require earlier notifications when they choose this option. We also encourage CARB to end "Neighborhood Electric Vehicles" credit issuance and revise proposed "BEVx" credits.

We support CARB's proposal to lower PM emission rates. We encourage CARB to accelerate fine particulate emission standards to achieve greater and more rapid public health benefits. We also encourage CARB staff to adjust the proposed ozone precursor limits for aggressive driving and air conditioning scenarios.

Attachment: www.arb.ca.gov/lists/zev2012/69-carb_clean_cars_1-25-2012_clean_copy_final.pdf

Original File Name: CARB clean cars 1-25-2012 clean copy final.pdf

Date and Time Comment Was Submitted: 2012-01-25 08:43:46

No Duplicates.

Comment 48 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Stuart

Last Name: Johnson

Email Address: stuart.johnson@vw.com

Affiliation:

Subject: VW Group ZEV Comments (Incl Criteria and GHG)

Comment:

Comments submitted via file upload in PDF format

Attachment: www.arb.ca.gov/lists/zev2012/70-vw_lev-iii_comments_jan-2012.pdf

Original File Name: VW_LEV-III_Comments_Jan-2012.pdf

Date and Time Comment Was Submitted: 2012-01-25 08:58:00

No Duplicates.

Comment 49 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Miriam

Last Name: Swaffer

Email Address: mswaffer@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: Comments on the 2012 Amendments to the CA ZEV regulation by CA members of UCS 1/25/2012

Comment:

The statement below represents the comments of 4,220 Californians who are members and supporters of the Union of Concerned Scientists. Please see the attached document (pdf) to view the full list of signers.

California has led the nation and the world in protecting public health with clean car standards for more than 50 years. Thank you for continuing to make California a leader in innovation with proposed vehicle and fuel policies that will cut vehicle pollution, guarantee consumer access to clean fuels, and foster the development of electric-car technology.

We support the proposed changes to the Zero Emissions Vehicles program while urging California Air Resources Board officials to strengthen the proposal by raising the requirement for battery, fuel cell, and plug-in hybrid electric vehicles to account for 1.8 million new vehicle sales in the state between 2018 and 2025 and by eliminating or significantly modifying provisions that allow automakers to avoid meeting the full requirements.

We support the state's proposals to reduce global warming emissions for vehicles built between 2017 and 2025 to 166 grams per mile.

We support the proposal to reduce smog-forming emissions from new cars and light truck tailpipes by 75 percent by 2025 and a reduction in toxic particulate matter by 2028, while urging California Air Resources Board officials to move up the date on toxic particulates to 2022.

We support the proposals for the Clean Fuels Outlet rules to ensure California consumers have access to hydrogen fuel and electricity for advanced vehicles.

Thank you for providing a vision for a cleaner transportation future for California with this inspiring package of clean car standards.

Signed,
SEE ATTACHMENT FOR LIST OF SIGNERS

Attachment: www.arb.ca.gov/lists/zev2012/71-comments_from_ucs_supporters_on_ca_clean_cars_standards_1-25-2012.pdf

Original File Name: Comments from UCS Supporters on CA Clean Cars Standards 1-25-2012.pdf

Date and Time Comment Was Submitted: 2012-01-25 09:13:02

No Duplicates.

Comment 50 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Andrew

Last Name: Ginsburg

Email Address: ginsburg.andy@deq.state.or.us

Affiliation:

Subject: Comments on Zero Emission Vehicle Rule Amendments

Comment:

Would like to speak. Comments have been uploaded. Thank you.

Attachment: www.arb.ca.gov/lists/zev2012/72-carb_zev_oregon_comments__2_.docx

Original File Name: CARB ZEV Oregon comments (2).docx

Date and Time Comment Was Submitted: 2012-01-25 09:22:05

No Duplicates.

Comment 51 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Lloyd

Last Name: Tran

Email Address: LTran@cleantechinstitute.org

Affiliation: Cleantech Institute

**Subject: Electric Vehicle Conversion -Amended to the Zero Emission Vehicle Regulation
Comment:**

AB 32 Requires reducing GHG emissions to 1990 levels by 2020 - a reduction of about 25 percent,

Governor's executive order S-3-05 (2005)requires an 80 percent reduction below 1990 levels by 2050.

California must go from 480 mmT CO2e today to 80mmT CO2e in 38 years.

A recent study from Lawrence Berkeley National Lab reports that in order to meet with the 33% Renewable Portfolio Standard target, 75 % of all vehicles in California must be 100% electrified by 2050.

There were 35 million registered vehicles in California in 2010. The overall median age for automobiles was 10 years, a significant increase over 1990 when the median age of vehicles in operation in the US was 6.5 years.

This relatively high age of automobiles in the US might be explained by unaffordable prices for comparable new replacement vehicles.

Even the current Federal Tax Deductible of \$7,500 and \$2,500 rebates from the State of California for brand new electric cars, there were only 1,558 electric and hybrid vehicles in California in 2011 (according to a recent publication by Southern California Edison)

With this rate of slow adoption and the high cost of new electric cars, it would not be possible to achieve the targeted of 30 million new electric cars on the road in 38 years, which represents 75% of all vehicles in California in 2050.

This goal can be achieved if we include the existing old vehicles which have been converted into electric.

There are more than 1,000 converted electric vehicles in California. The process is relative simple which use the existing durable chassis and durable car body to replace the internal combustion engine, radiator, water pump, fuel pump, gas tank and other components with an electric motor, a controller and a battery pack.

The reason there is a modest number of converted electric cars on the road is due to the fact that there is no federal or state support and incentive to subsidize the cost of doing an electric

vehicle conversion. An average cost of converting an internal combustion engine car into 100% electric is about \$10,000- \$15,000 depending on the types of battery pack system.

On behalf of the Cleantech Institute, I hereby request the CARB to subsidize the cost the electric vehicle conversion as a part of the Amended to the California Zero Emission Vehicle Regulation.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-01-25 09:36:30

No Duplicates.

Comment 52 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

This comment was posted then deleted because it was unrelated to the Board item or it was a duplicate.

Comment 53 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Susan

Last Name: Campbell

Email Address: scampb56@jaguarlandrover.com

Affiliation: Jaguar Land Rover North America,LLC

Subject: JLRNA Comments to ZEV ISOR January 2012

Comment:

Jaguar Land Rover North America, LLC's (JLRNA) Comments in response to the December 7, 2011 " California Environmental Protection Agency Air Resources Board Staff Report: Initial Statement of Reasons Advanced Clean Cars 2012 Proposed Amendments to the California Zero Emission Vehicle Program Regulations." Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/75-jaguar_land_rover_comments_zev_isor_jan_25_2012.pdf

Original File Name: Jaguar Land Rover Comments_ZEV_ISOR Jan 25 2012.pdf

Date and Time Comment Was Submitted: 2012-01-25 09:56:03

No Duplicates.

Comment 54 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Miriam
Last Name: Swaffer
Email Address: mswaffer@ucsusa.org
Affiliation: Union of Concerned Scientists

Subject: Statement by Economists from UCS Science Network
Comment:

The statement below represents the comments of 114 Ph.D. economists from around the nation. Please see the attached document (pdf) to view the full list of signers.

Gina McCarthy
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue N.W.
Washington, DC 20004

David Strickland
Administrator
National Highway Traffic Safety Administration
1200 New Jersey Avenue, SE, West Building
Washington, DC 20590

Mary D. Nichols
Chairman, California Air Resources Board
1001 I Street
P.O. Box 2815
Sacramento CA 95812

June 7, 2011

Dear Assistant Administrator McCarthy, Administrator Strickland,
and Chairman Nichols:

Last year, the Environmental Protection Agency (EPA), the National Highway Traffic Safety Administration (NHTSA), and the California Air Resources Board (CARB) worked together to set standards through 2016 that would raise the average fuel efficiency of new vehicles to about 34.1 miles per gallon and cut the average global warming pollution from new vehicles to about 250 grams per mile. Now, your agencies are working together to develop the second phase of standards covering new vehicles sold in model years 2017-2025 that could cut new vehicle global warming emissions up to an additional 45 percent and raise fuel efficiency standards to as much as 60 miles per gallon.

Strong, cost-effective standards will provide consumers with a wider choice of cleaner and more fuel efficient vehicles that save drivers money. In the absence of standards, market barriers prevent drivers from realizing these savings, leaving drivers without the options they need to respond to volatile and rising gasoline prices. Standards are the right policy approach given the realities

of this marketplace.

Our continued dependence on oil puts our economy at risk from the effects of oil price volatility and energy insecurity. Oil price spikes were associated with most of the U.S. recessions in the past 40 years.¹ The United States currently sends \$1 billion each day to foreign countries to pay for oil and other petroleum products—that is equivalent to more than half of the average daily U.S. trade deficit over the last decade.²

Strong standards that save drivers money can also support robust employment. Increasing standards will promote new vehicle technologies and increase investment in the auto industry, generating new jobs throughout that sector. The savings consumers realize at the pump will also shift consumer purchases away from the petroleum and wholesale industries to other parts of the economy that generate more jobs for every dollar spent.³

Finally, strong standards will help reduce the heat-trapping emissions that cause global warming. Current and projected climate change impacts pose significant risks to public health, the economy, and the environment. Delaying action now and waiting for the future before initiating accelerated action to reduce global warming emissions would be more costly than initiating action now.

We support these efforts to reduce global warming emissions, improve the fuel efficiency of our vehicles, reduce our dependence on oil, and protect public health by ensuring drivers have more choices for clean cars and light trucks through the use of strong, cost-effective standards.

Signed,
SEE ATTACHMENT FOR LIST OF SIGNERS

1 Causes and Consequences of the Oil Shock of 2007-08,
http://www.brookings.edu/~media/Files/Programs/ES/BPEA/2009_spring_bpea_papers/2009a_bpea_hamilton.pdf
What is An Oil Shock, Hamilton (2003)
<http://dss.ucsd.edu/~jhamilto/oil.pdf>

2. Cost of petroleum imports based on U.S. Energy Information Agency data, net petroleum product imports between March 19th 2010 and March 18th 2011 averaged 9.6 million barrels per day. At \$100 per barrel, this equates to \$960 million dollars per day. EIA data available at:
http://www.eia.doe.gov/dnav/pet/pet_move_wkly_dc_NUS-Z00_mbbldpd_w.htm
Historical U.S. trade data from the U.S. BEA available at:
http://www.bea.gov/newsreleases/international/trade/trad_time_series.xls

3. Based on data from the Bureau of Labor Statistics,
http://www.bls.gov/emp/ep_data_industry_out_and_emp.htm

Attachment: www.arb.ca.gov/lists/zev2012/76-clean-cars-economists-letter-2011.pdf

Original File Name: clean-cars-economists-letter-2011.pdf

Date and Time Comment Was Submitted: 2012-01-25 10:34:15

No Duplicates.

Comment 55 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Azita

Last Name: Khalili

Email Address: azita.khalili@bmwna.com

Affiliation: BMW of North America, LLC

Subject: BMW Comments on the Proposed Amendments to the California Zero Emission Vehicle Program

Comment:

BMW Comments on the Proposed Amendments to the California Zero Emission Vehicle Program Regulations

Attachment: www.arb.ca.gov/lists/zev2012/77-20120125_bmw_comments_zev_cfo_final.pdf

Original File Name: 20120125_BMW_comments_ZEV_CFO_final.pdf

Date and Time Comment Was Submitted: 2012-01-25 10:42:33

No Duplicates.

Comment 56 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Jay
Last Name: Friedland
Email Address: jay@pluginamerica.org
Affiliation: Plug In America

Subject: Comments from Plug In America on Proposed 2012 Changes to the Zero Emission Vehicle (ZEV)

Comment:

Please see attached response letter.
Thank you!

Attachment: www.arb.ca.gov/lists/zev2012/78-arb_zev_pia_support_012512_final.pdf

Original File Name: ARB_ZEV_PIA_Support_012512_Final.pdf

Date and Time Comment Was Submitted: 2012-01-25 10:51:46

No Duplicates.

Comment 57 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Chris

Last Name: Carney

Email Address: ccarney@ucsusa.org

Affiliation: Union of Concerned Scientists

Subject: CA Scientists & Engineers on Advanced Clean Cars & Reducing Heat-Trapping Emissions

Comment:

The statement below represents the comments of 159 scientists and engineers who live or work in California. Scientists have published and have a Ph.D. or are in a Ph.D. program. Engineers have a Ph.D., or a master's degree with at least five years of career experience, or a bachelor's degree with at least ten years of career experience. All signers have expertise relevant to our understanding of climate change, its impacts, or solutions. Please see the attached document (pdf) to view the full list of signers.

An Open Letter from California Scientists and Engineers on Advanced Clean Cars and Reducing Heat-Trapping Emissions

We write to urge California leaders to seize the opportunity, once again, to demonstrate that the nation can begin to meet the climate challenge by adopting strong policies that will further reduce heat-trapping emissions from cars and trucks.

The causes and risks of climate change are clear and well documented. In May 2010, a report by the U.S. National Academy of Sciences concluded "Climate change is occurring, is caused largely by human activities, and poses significant risks for—and in many cases is already affecting—a broad range of human and natural systems."

Global average surface temperatures have increased at a rate of 0.7°C (1.3°F) per century since 1900, with the rate accelerating to approximately 0.16°C (0.29°F) per decade since 1970(1), and impacts are now being observed worldwide.(2) These temperature changes, driven by human-caused emissions, have locked in further changes, such as sea-level rise that intensifies coastal flooding and dramatic changes in snowpack that risk disrupting water supplies in the western United States.(3) If emissions continue unabated, California will face continued warming with more temperature extremes, faster sea-level rise, increasing risks and cost for agriculture, and severe public health challenges for at-risk populations.(4)

The longer we wait to bring down emissions, the harder and more costly it will be to limit climate change impacts and to adapt to those that cannot be avoided. We already have the solutions and technology to start significantly reducing emissions.

Informed by the threats to California from climate change, the

state has set a long-term goal to reduce its heat-trapping emissions 80 percent below 1990 levels by 2050. Cars, trucks, and other mobile sources account for nearly 40 percent of these emissions in California. (5)

We urge you to adopt policies that will reduce heat-trapping emissions from cars and trucks over the next decade and beyond, while promoting advancements in vehicle and fuel technologies that will create jobs and will be needed to meet the state's long-term emissions reductions goals.

Signed,
SEE ATTACHMENT FOR LIST OF SIGNERS

This letter may also be downloaded at
http://www.ucsus.org/assets/documents/clean_vehicles/ca-scientist-letter.pdf

Attachment: www.arb.ca.gov/lists/zev2012/79-ca-scientist-letter.pdf

Original File Name: ca-scientist-letter.pdf

Date and Time Comment Was Submitted: 2012-01-25 10:34:22

No Duplicates.

Comment 58 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: John
Last Name: Shears
Email Address: shears@ceert.org
Affiliation: CEERT

Subject: CEERT Comments on the Proposed Advanced Clean Cars Regulations
Comment:

Please find attached the Comments of the Center for Energy Efficiency and Renewable Technologies on the proposed Advanced Clean Cars Regulations.

JShears

Attachment: www.arb.ca.gov/lists/zev2012/80-ceert_comments_on_2012_amendments_to_lev_zev_cfo_01.25.12.pdf

Original File Name: CEERT Comments on 2012 Amendments to LEV, ZEV, & CFO 01.25.12.pdf

Date and Time Comment Was Submitted: 2012-01-25 10:55:47

No Duplicates.

Comment 59 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Robert

Last Name: Bienenfeld

Email Address: Robert_Bienenfeld@ahm.honda.com

Affiliation: American Honda Motor Co., Inc.

Subject: Honda's Comments on ZEV and Adv. Clean Car Regulations

Comment:

Please see attached.

Attachment: [www.arb.ca.gov/lists/zev2012/81-](http://www.arb.ca.gov/lists/zev2012/81-honda_comments_on_2012_amendments_to_zev_and_advanced_clean_car_regulations.pdf)

[honda_comments_on_2012_amendments_to_zev_and_advanced_clean_car_regulations.pdf](http://www.arb.ca.gov/lists/zev2012/81-honda_comments_on_2012_amendments_to_zev_and_advanced_clean_car_regulations.pdf)

Original File Name: Honda Comments on 2012 Amendments to ZEV and Advanced Clean Car Regulations.pdf

Date and Time Comment Was Submitted: 2012-01-25 11:03:22

No Duplicates.

Comment 60 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Jonathan
Last Name: Morrison
Email Address: Jmorrison@cncda.org
Affiliation:

Subject: California New Car Dealers Association Comments
Comment:

Attached please see the California New Car Dealers Association
comments on ZEV2012

Attachment: www.arb.ca.gov/lists/zev2012/82-cncda_comments_re_2012_zev_regs.pdf

Original File Name: CNCDA Comments re 2012 ZEV Regs.pdf

Date and Time Comment Was Submitted: 2012-01-25 10:42:19

No Duplicates.

Comment 61 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Yuli
Last Name: Chew
Email Address: yulichew@yahoo.com
Affiliation:

Subject: 2012 Amendments to the California ZEV Regulations
Comment:

Yuli Chew
38 Rocha Ct
Hammonton, NJ 08037
(609)-561-0698
Email: yulichew@yahoo.com

January 25, 2012

California Air Resource Board
101 I Street
Sacramento, CA 95814

Dear Sir or Madam:

Re: 2012 Amendments to the California ZEV Regulations

I am writing to strongly support the goals of the ZEV Program to achieve the health base air quality standards and the greenhouse gas emission goals.

Here are some of my comments regarding certain sections of the proposed rule.

1962.1(b)(1)

The ZEV requirement is clarified based on the annual NMOG production report. However, it would be useful also to clarify if the exempted vehicles such as emergency and law enforcement vehicles should be included, even if they are certified according to the California certification. To allow for any exemption will encourage these vehicles from properly accounted for.

1962.1(b)(1)(B)(1)(g)

Carry-over of Excess Credits

The clause did not explain explicitly that the elimination of carry-over limitations for MY2011 and later as explained in the ISOR.

1962.1(b)(2)(D)(4)

Use of Additional Credits for Transportation Systems

I would propose add additional ZEV types to minimize confusion:
'Any additional credits for transportation systems generated from different categories of ZEVs in accordance with subdivision 1962.1(g)(5)...."

1962.1(b)(4)

Requirements for Small Manufacturers and Independent Low Volume Manufacturers

Additional language may be added to clarify that they are only entitled to earn delivery for sale and place in service credit in each state, and not traveling credits in the 177 States.

1962.1(d)(5)(C)

A vehicle is not eligible to receive credits if it is placed in service after December 31, five years after the model year.

Allowing five years to place a ZEV may be too long and undermined the compliance efforts by the regulators. Most of the placed in service ZEV can be traced 9 months after the end of the model year (as in the current regulation allows) from the state motor vehicle registration agencies. If they are not sold by the next three years, it would be difficult to imagine that the customers would prefer the older models.

Concerns should be taken to prevent any stakeholders who deliberate do not submit on time. To allow for this length of time will disrupt the smooth flow of data collection and undue disruptions for late data later on.

I would suggest that for those ZEV that had been placed in the model year, they should continue to submit the credits nine months after the model year ended. For those ZEV that are yet to be placed, a 3 years extension would be sufficient.

For a multiple state dealership that may sell across different states with or without the ZEV mandate, awarding "deliver for sale" credits to all ZEV vehicles placed through the chain can be misused. The only evidence may be from the delivery receipts or from that evidences from the Manufacturers Source of Origin. There may be only a portion of them that will eventually sold to the residents in the state and earn the "place in service" credits. The ratio of "deliver for sale" to "place in service" may have to be capped, e.g. at 1.2 before this provision is being abused.

Increased Type V credits in 2015 - 2017 from 7 to 9

The reason for this, according to the ISOR, was that an OEM would have to sell 3 BEVs (average 9 ZEV credits) to be of the same value as 1 FCV. However, BEVs are proposed to travel until 2017. The section 177 States would also like to set a reasonable and achievable level of pool for the compliance, with the acceptance from the OEMs. As such, there is no urgency for this argument. The Type V FCV will stay as it is to get 7 credits, with 1 credit per 50 mile range.

Toyota even predicts that the price for the FCV vehicles may drop to \$100,000 range by 2015.

<http://www.bloomberg.com/news/2011-01-13/toyota-advances-hydrogen-plans-amid-industry-s-battery-car-push.html>

2015 Toyota Hydrogen Car Will Cost \$50,000

<http://www.insideline.com/toyota/2015-toyota-hydrogen-car-will-cost-50000.html>

Toyota says cost of FCHV-adv fuel cell protoytppe is \$129,270

<http://green.autoblog.com/2011/08/03/toyota-says-cost-of-fchv-adv-fuel-cell-prototytppe-is-129-270/>

1962.1(g)(2)

Converting PZEV and AT PZEV Credits after Model Year 2017

I would support that same discount factor be applied for both LVM and IVM. How can you prevent a transfer of PZEV balance credit from a LVM to a IVM and get a better value and then trade the credit back to LVM?

1962.1(g)(5)(A)

ZEV credits for Transportation Systems

I would suggest the elimination of additional credits for the transportation project obtained from AT PZEV and PZEV from 2012 and later, since it seems that no OEMs have participate directly for these vehicles. These vehicle technologies have been in the market for a long time and should be phased-out.

1962.1(g)(6)(A)

Use of NEV credits

Allow up to 50% NEV credits to meet TZEVs and AT PZEV credits for 2012 - 2017.

I think that allowing NEV credits to meet up to 50% of TZEV credit requirements is too high, it should be reduced to just at 25% level to encourage the growth of this TZEV technology sector.

1962.1(g)(6)(B)

Carry forward provisions for LVMs for 2009 - 2011 Model Years
There may have to be clearer language to indicate that this provision sunset after 2011 Model Year.

1962.2(d)(5)(A)1.

A ZEV with less than 50 miles UDSS range will receive zero credits.

A NEV with 25 mile range can receive 0.15 ZEV credit. However, for another BEV that travels between 26 miles to 49 miles will receive no credit at all? Shouldn't it be fair that this BEV receive some credit above what a NEV would get?

1962.2(d)(5)(E)

Counting Specified ZEVs Placed in Service in a Section 177 State and in California

CARB should encourage the early deployment of FCVs by encouraging that only after a minimum level of FCV in the North East Region / 177 State before any excess credits can be traveled. The minimum level should also account for the placement of the battery electric vehicles. In short, only after the minimum quantities of BEVs and FCVs, that any excess FCV credits can be traveled.

Capping maximum aggregate reduction of required mandate to ensure no blackout period

Proposed reduction sources:

- up to one-tenth from transportation credits
- up to 50% from Type 1.5X & Type IIX
- up to 50% reduction from GHG Overcompliance
- Allow usage of banked credits - up to 50%?
- allow usage of converted credits from PZEV, AT PZEV or NEV - up to 25% for the TZEV portion;

I would suggest that all mitigation credits should not reduce the current mandate by an aggregate to a maximum of 50%, both for the ZEV and TZEV portions.

Yours truly,

Yuli Chew

A Member of CHMM (Certified Hazardous Material Manager)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-01-25 11:17:03

No Duplicates.

Comment 62 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Allis
Last Name: Druffel
Email Address: allis@interfaithpower.org
Affiliation: California Interfaith Power & Light

Subject: Submitted Documents in Support of LEV III Standards from Faith Community
Comment:

Hello,

Please find attached the following documents:

1. A letter signed by representatives of 10 faith organizations in support of CARB's proposed Clean Cars Standards.
2. An e-letter, originated from a California Interfaith Power & Light action alert, in support of CARB's proposed Clean Cars Standards signed by 159 advocates from the California faith community. Please note subject line of e-letter is "People of Faith for Cleaner Air and a Healthier Planet."
3. An excel file with the names and info on the 159 advocates who signed the e-letter.

Thank you to Jane and Mary-Alice for their assistance to me last week.

Please do not hesitate to call or email me with any questions related to these submissions.

Thank you.

Allis Druffel
Southern California Outreach Director
California Interfaith Power & Light

Attachment: www.arb.ca.gov/lists/zev2012/84-documents_for_carb_01.25.12.zip

Original File Name: Documents for CARB 01.25.12.zip

Date and Time Comment Was Submitted: 2012-01-25 10:46:21

No Duplicates.

Comment 63 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Janet

Last Name: Scully

Email Address: jscully@ph.lacounty.gov

Affiliation: Asthma Coalition of Los Angeles County

Subject: Letter of Support for the proposed clean air standards

Comment:

See Attached.

Attachment: www.arb.ca.gov/lists/zev2012/85-carb_clean_cars_letter_of_support_from_aclac.pdf

Original File Name: CARB Clean Cars Letter of Support from ACLAC.pdf

Date and Time Comment Was Submitted: 2012-01-25 11:23:30

No Duplicates.

Comment 64 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Chris

Last Name: Salmi

Email Address: chris.salmi@dep.state.nj.us

Affiliation: NJDEP

Subject: NJ comments on ZEV Regulation

Comment:

Please see the attached letter from Director O'Sullivan for NJ's support of the ZEV Optional Compliance Path. If you have any questions, please do not hesitate to contact me.

Thank you.

Chris Salmi

Assistant Director

Division of Air Quality

New Jersey Department of Environmental Protection

Attachment: www.arb.ca.gov/lists/zev2012/86-zev_comments_new_jersey.pdf

Original File Name: ZEV Comments_New Jersey.pdf

Date and Time Comment Was Submitted: 2012-01-25 11:23:30

No Duplicates.

Comment 65 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Daniel

Last Name: Altman

Email Address: danielaltman12@gmail.com

Affiliation:

Subject: ZEV emissions

Comment:

After reading the proposed emission standards for light duty trucks in the Air Resources Board's Report, I would like to state that objections to the proposed standards should be viewed skeptically. First, while automobile manufacturer's can claim that stricter standards will result in higher costs, the overall percentage is minimal because it allows companies to produce vehicles that create lower emissions while at the same relying on those same vehicles to alter their percentage of vehicles producing carbon emissions. Secondly, while corporations tout their production of hybrid vehicles they continue to maintain that production of vehicles remains costly. Automobile manufacturers have invested in research and development indicating that they believe corporate viability can be reached through the implementation of alternative fuels. This research alone should result in the implementation of new technology that may be expensive at the beginning, but should become less expensive as innovations are implemented. A case in point could be used by applying the Nissan Leaf and the Tesla model S. Both rely on battery-powered engines, but the cost of the vehicles is significantly different. While the Model S will start 59,900 after government subsidies, the battery powered LEAF will cost 27,700 after government rebates. This allows customers as well as corporations to produce alternative fuel vehicles while making them available to the public. In this sense, as corporations continue to develop in this technology, such transitions will allow them to share technology with other vehicles reducing the overall cost of production.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-01-25 11:28:46

No Duplicates.

Comment 66 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Les

Last Name: Hamasaki

Email Address: leshamasaki9@yahoo.com

Affiliation: US Green Vehicle Council & Tom Bradley L

Subject: Cash for EV Retrofit Initiative

Comment:

The US Green Vehicle Council is advocating a "Cash for EV Retrofit" program that proposes to incentivize with cash subsidies or rebates by local and federal agencies (i.e., AQMD, DOE, DOL, etc) to convert gas guzzlers to electric vehicles in order to meet California AB 32 mandate. This program will:

- Save commuters money, especially if gas prices reach \$5/gal;
- Win our energy independence from imported oil;
- Insure our National Security;
- Reduce our international trade deficit where 1/3+ is for oil import;
- Clean our air we breathe to prevent asthma in our children and cancer in our elderly;
- Prevent a global food crisis caused by the rising cost of oil for transportation and fertilizer, etc;
- Reduce our carbon footprint; and
- Empower small EV technician and specialist to create local jobs and small businesses, especially our Veterans that sacrifices American blood for oil.

President Obama established a goal of purchasing 1 million new electric vehicles on the road by 2015 by governmental agencies and consumers, primarily focused on vehicles made by large automakers, in order to revive the auto industry and save jobs. USGVC believes that we must develop a comprehensive strategy to include the retrofitting of the existing 35 million vehicles in California to accelerate the EV Evolution.

USGVC is proposing to retrofit 1 million ICE Clunkers to EVs by 2015, if proper incentives are available today.

Currently, the Cleantech institute has provided training in EV Technicians in California that is funded by the workforce investment board. We are training our returning veterans to become EV Conversion specialists to reduce our addiction to imported oil in order to insure our National Security.

There are over 500 million internal combustion engine (ICE) vehicles operating in the US today, approximately 1.5 vehicles per person in the U.S. Unless we have a program to not only purchase brand new electric vehicles, but to create a network of Green Vehicle Conversion Centers, we are not addressing the issue of climate change and meeting California's AB 32 mandate.

I recommend that ARB pursue an aggressive Cash for EV Conversion Program.

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-01-25 11:15:03

No Duplicates.

Comment 67 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Sandra
Last Name: Stewart
Email Address: sandra@thinkshiftcom.com
Affiliation: Green Chamber of Commerce

Subject: Adopt the strongest possible clean car rules
Comment:

The Green Chamber of Commerce appreciates the opportunity to submit the attached comments encouraging the board to adopt the Advanced Clean Cars package.

Thank you.

Attachment: www.arb.ca.gov/lists/zev2012/90-green_chamber_comments_clean_cars_standards.pdf

Original File Name: Green Chamber_comments_clean cars standards.pdf

Date and Time Comment Was Submitted: 2012-01-25 11:36:36

No Duplicates.

Comment 68 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Connecticut Departme
Last Name: Energy and Environme
Email Address: Paul.Farrell@ct.gov
Affiliation: Connecticut DEEP

Subject: Connecticut Comments on Amendments to the California Zero Emission Vehicle Program

Comment:

Dear Board Members,

Please see the attached letter for the Connecticut Department of Energy and Environmental Protection's comments on the proposed rule making. Thank you.

Attachment: www.arb.ca.gov/lists/zev2012/91-california_air_resources_board_letter.pdf

Original File Name: California Air Resources Board letter.PDF

Date and Time Comment Was Submitted: 2012-01-25 11:19:30

No Duplicates.

Comment 69 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Wendy
Last Name: Greuel
Email Address: Controller.Greuel@lacity.org
Affiliation: Los Angeles City Controller

Subject: ZEV Comments
Comment:

January 26, 2012

Mary D. Nichols, Chairperson
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

Dear Ms. Nichols:

Today, the Air Resources Board is considering the adoption of Advanced Clean Car Standards that would require reductions in greenhouse gas emissions, reductions in smog-forming emissions, increased zero emission vehicles (ZEVs), and increased availability of fuels for ZEVs. As Los Angeles City Controller and one of the Co-Chairs of the California Clean Cars Campaign, I support creating a cleaner environment that will benefit our City, region and local economy. California has led the nation in adopting legislation for cleaner cars and we must continue leading the way.

Clean cars and clean fuel infrastructure support a thriving local economy. At a time when our economy has still not recovered, we need to take affirmative action to create jobs and put money back into our local economy. When families and businesses save money on cleaner cars and health care, they have more money to spend on goods and services in their local community. California is helping build the market for these new cars and local governments are leading the charge. Local governments are on the front lines when it comes to responding to the impacts of climate change and need to make use of all the tools available, including vehicles that help clean up the air and reduce the effects of climate change.

We don't have to choose between a robust economy and clean cars - we can enjoy both. The Clean Cars Program cleans the air and improves public health, and also supports a strong economy and promotes job growth. This decision will set in motion the actions needed to spur development of the cleanest, most innovative vehicle technologies to help the state meet its near- and long-term emissions and climate change goals. Thank you for your consideration of these regulations today.

Sincerely,

WENDY GREUEL
City Controller

Attachment: www.arb.ca.gov/lists/zev2012/92-1-26-12_carb.pdf

Original File Name: 1-26-12 CARB.pdf

Date and Time Comment Was Submitted: 2012-01-25 11:42:09

No Duplicates.

Comment 70 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Katherine
Last Name: Yehl
Email Address: kyehl@volvocars.com
Affiliation: Volvo Car Corporation

Subject: Volvo Car Corporation Comments on California's Clean Cars Package
Comment:

Volvo Car Corporation (VCC) appreciates the opportunity to submit comments in response to California's proposed California's Clean Cars Package.

Attachment: www.arb.ca.gov/lists/zev2012/93-carb_clean_cars_package_vcc_comments_final.pdf

Original File Name: CARB Clean Cars Package VCC Comments FINAL.pdf

Date and Time Comment Was Submitted: 2012-01-25 11:53:05

No Duplicates.

Comment 71 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: William E.

Last Name: Avery

Email Address: Non-web submitted comment

Affiliation:

Subject: California State University Sacramento

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/94-avery__zev___lev_.pdf

Original File Name: Avery (ZEV & LEV).pdf

Date and Time Comment Was Submitted: 2012-01-31 10:06:28

No Duplicates.

Comment 72 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Eileen

Last Name: Tutt

Email Address: kriss@caletc.com

Affiliation:

Subject: California Electric Transportation Coalition

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/95-eileen_tutt.pdf

Original File Name: Eileen Tutt.pdf

Date and Time Comment Was Submitted: 2012-01-31 10:37:05

No Duplicates.

Comment 73 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Kellen

Last Name: Schefter

Email Address: KSchefter@fiskerautomotive.com

Affiliation:

Subject: Fisker Automotive, Inc.

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/96-fisker_zev.pdf

Original File Name: Fisker ZEV.pdf

Date and Time Comment Was Submitted: 2012-01-31 10:56:33

No Duplicates.

Comment 74 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Loren

Last Name: Marz

Email Address: lmarz@charter.net

Affiliation:

Subject: Comments on LEV III Proposed Regulation

Comment:

While fully supporting the spirit of the proposed LEV III Regulation, it doesn't appear that the impacts of a significant shift to "ZEV" technology such as electric vehicles (EV) have been fully considered.

According to a National Academies report (National Academies, "Hidden Costs of Energy: Unpriced Consequences of Energy Production and Use.")...

"...Electric vehicles and grid-dependent (plug-in) hybrid vehicles showed somewhat higher nonclimate damages than many other technologies for both 2005 and 2030. Operating these vehicles produces few or no emissions, but producing the electricity to power them currently relies heavily on fossil fuels; also, energy used in creating the battery and electric motor adds up to 20 percent to the manufacturing part of life-cycle damages...."

This is supported by the latest version of Argonne National Laboratory's GREET model (GREET1_2011 - <http://greet.es.anl.gov/>) which shows that WTW emissions of particulate matter (PM) in California are higher for EV technology than current "clean diesel" technology. Based on the default "mid-sized" vehicle assumed in GREET for the year 2020...

WTW PM10 (diesel) = 0.004 (Feedstock) + 0.009 (Fuel) + 0.030 (Vehicle Operation) = 0.043 g/mi

WTW PM10 (EV) = 0.060 (Feedstock) + 0.006 (Fuel) + 0.021 (Vehicle Operations) = 0.087 g/mi

WTW PM2.5 (diesel) = 0.003 (Feedstock) + 0.005 (Fuel) + 0.016 (Vehicle Operations) = 0.024 g/mi

WTW PM2.5 (EV) = 0.015 (Feedstock) + 0.004 (Fuel) + 0.007 (Vehicle Operations) = 0.026 g/mi

All of these values are based on the California electric generation mix assumed in GREET in 2020.

Exhaust PM from the diesel vehicle assumed in GREET = 0.009 g/mi (PM10); 0.0084 g/mi (PM2.5).

Furthermore, based on certified emissions of the 2003 VW Jetta TDI (example of an "old tech" diesel vehicle), exhaust PM emissions = 0.05 g/mi

(http://www.arb.ca.gov/msprog/onroad/cert/pcltdtdv/2003/volkswagen_pc_a0070228_ld9_1_diesel.pdf).

$0.05 - 0.009 = 0.041$ g/mi more exhaust PM for the "old tech" diesel than that assumed for "clean diesel" in GREET.

0.043 g/mi + 0.041 g/mi = 0.084 g/mi WTW PM10 for the "old tech" diesel car, actually less than the 0.087 g/mi WTW PM10 calculated by GREET for EV in California for 2020.

"Old tech" diesel vehicles have been effectively banned for many years under LEV II regulations, to the Air Resources Board's credit, yet mandates are being proposed for vehicle technology (e.g., EV) which may actually increase PM emissions from a WTW perspective above "old tech" diesel engine technology. EPA acknowledges in the Draft RIA for the Proposed Rule to Extend the National Program to Reduce Greenhouse Gases and Improve Fuel Economy for Cars and Trucks - Docket ID No. EPA-HQ-OAR-2010-0799, that all PM2.5 is treated as equally potent in causing premature mortality regardless of source (page 6-35 of the Draft RIA), even specifically mentioning PM2.5 from diesel engine sources. So there appears to be no valid reason from a public health perspective to displace the reduction in PM2.5 emissions from diesel engines with increased PM2.5 emissions from power plants to support EV/PHEV technology. The regulatory push for these "advanced technologies" defies logic from an emissions perspective.

A massive shift to EV/PHEV technology would potentially offset gains made from diesel PM emission reduction mandates. It appears superfluous to propose significant reductions in PM emissions from gasoline/diesel vehicles under LEV III to trivial levels (which I support) yet essentially mandate technology which not only doesn't decrease WTW PM emissions from current technology, it increases WTW PM emissions with respect to pre-2004 (Tier 1) diesel vehicles.

I would like to state unequivocally that I support EV/PHEV technology for certain niches (e.g., urban commuter travel), but upstream emissions of this technology really need to be taken into account.

As a disclaimer, I am in no way associated with the auto industry or any support industries to the auto industry, including diesel engine manufacturers.

Thank you for your consideration of these comments.

Respectfully submitted,

Loren Carl Marz, Certified Consulting Meteorologist (#591)

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-01-23 11:01:37

No Duplicates.

Comment 75 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Joe

Last Name: Martens

Email Address: seflint@gw.dec.state.ny.us

Affiliation:

Subject: State of New York Department of Conservation

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/98-new_york_zev.pdf

Original File Name: New York ZEV.pdf

Date and Time Comment Was Submitted: 2012-01-31 11:46:04

No Duplicates.

Comment 76 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: David

Last Name: Patterson

Email Address: david.patterson@na.mitsubishi-motors.com

Affiliation:

Subject: Mitsubishi Motors

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/99-mitsubishi.pdf

Original File Name: Mitsubishi.pdf

Date and Time Comment Was Submitted: 2012-01-31 11:46:04

No Duplicates.

Comment 77 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Barry
Last Name: Wallerstein
Email Address: bwallerstein@aqmd.gov
Affiliation: South Coast AQMD

Subject: SCAQMD Staff Comments to the Proposed "LEV III" Amendments to California Greenhouse Gas

Comment:

Please see attachment re SCAQMD Staff Comments to the Proposed "LEV III" Amendments to the California Greenhouse Gas and Criteria Pollutant Exhaust and Evaporative Emission Standards and Test Procedures and to the On-Board Diagnostic System Requirements for Passenger Cars, Light-Duty Trucks, and Medium-Duty Vehicles, and to the Evaporative Emission Requirements for Heavy-Duty Vehicles and Proposed 2012 Amendments to the California Zero Emission Vehicle Regulation

Attachment: www.arb.ca.gov/lists/leviiiighg2012/25-lev_iii.pdf

Original File Name: LEV III.pdf

Date and Time Comment Was Submitted: 2012-01-24 11:25:29

No Duplicates.

Comment 78 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Todd
Last Name: Crook
Email Address: ToddDCrook@gmail.com
Affiliation:

Subject: Form Letter # 6
Comment:

Dear Ms. Nichols and the CARB Board,

As one who drove the 100% Electric BMW MINI E over 50K miles and now currently driving the 100% Electric BMW ACTIVE E, I urge the CARB Board to close a gaping loophole that could deal a blow to the proliferation of plug-in vehicles just as we are starting to see real volume production. We urge you not to approve the proposed "overcompliance" provision which would dramatically weaken the California ZEV program allowing automakers that 'overcomply' with the new Federal GHG standards to get away with producing fewer EVs. This provision allows an automaker to cut the number of pure electric-drive vehicles by as much as 50% over the 2018 to 2021 timeframe in exchange for just 2 g/ mile GHG overcompliance during that time. This is a bad deal for California and for the United States!

Honda, Hyundai, and Toyota are once again trying to game the system. Please don't let them do this, especially as we see the great progress made by Nissan, GM, Ford, Tesla, Coda, and other OEMs truly committed to building a real sustainable business around electric vehicles.

You must close this loophole and not approve the proposed overcompliance provision, so that California will continue to drive high volumes of plug-in vehicles and the CARB board doesn't further weaken the ZEV mandate.

Signed,
Todd Crook

Todd Crook
290 Pomona Ave.
Long Beach, CA 90803

Attachment:

Original File Name:

Date and Time Comment Was Submitted: 2012-02-03 13:58:05

479 Duplicates.

Comment 79 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Steven

Last Name: Douglas

Email Address: sdouglas@autoalliance.org

Affiliation: Alliance of Automobile Manufacturers

Subject: Advanced Clean Car Regulation

Comment:

Attached are the comments of the Alliance of Automobile Manufacturers, a trade association representing 12 car and light-truck manufacturers.

Attachment: www.arb.ca.gov/lists/leviiighg2012/39-alliance_comments_lev_iii_with_attachments.pdf

Original File Name: Alliance Comments LEV III with Attachments.pdf

Date and Time Comment Was Submitted: 2012-01-25 09:32:39

No Duplicates.

Comment 80 for Zero Emission Vehicle Regulation (zev2012) - 45 Day.

First Name: Tyson

Last Name: Eckerle

Email Address: tyson@einow.org

Affiliation: Energy Independence Now

Subject: CFO and ZEV comments

Comment:

We strongly support the adoption of the Clean Fuels Outlet, Zero Emissions Vehicle, and Low Emission Vehicle regulation revisions.

Attachment: www.arb.ca.gov/lists/cfo2012/32-ein_cfo_zev2012_comments.pdf

Original File Name: EIN_CFO_ZEV2012_Comments.pdf

Date and Time Comment Was Submitted: 2012-01-25 11:05:32

No Duplicates.

Comment 1 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Michael

Last Name: Ong

Email Address: Non-web submitted comment

Affiliation:

Subject: American Lung Association

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/102-michael_ong.pdf

Original File Name: Michael Ong.pdf

Date and Time Comment Was Submitted: 2012-01-31 13:41:50

No Duplicates.

Comment 2 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Klaus

Last Name: Land

Email Address: Non-web submitted comment

Affiliation:

Subject: Mercedes-Benz

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/103-klaus_land.pdf

Original File Name: Klaus Land.pdf

Date and Time Comment Was Submitted: 2012-01-31 13:41:50

No Duplicates.

Comment 3 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Jack

Last Name: Gillis

Email Address: jack@jagillis.com

Affiliation:

Subject: Carson Black Chamber of Commerce

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/107-jack_gillis.pdf

Original File Name: Jack Gillis.pdf

Date and Time Comment Was Submitted: 2012-01-31 13:41:50

No Duplicates.

Comment 4 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Cathy

Last Name: Jackson-Ervin

Email Address: Non-web submitted comment

Affiliation:

Subject: Operation Free

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/108-cathy_jackson_ervin.pdf

Original File Name: Cathy Jackson Ervin.pdf

Date and Time Comment Was Submitted: 2012-01-31 13:41:50

No Duplicates.

Comment 5 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Tim
Last Name: Carmichael
Email Address: tim@cngvc.org
Affiliation:

Subject: California Natural Gas Vehicle Coalition
Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/110-tim_carmichael__written_submission_.docx

Original File Name: Tim Carmichael (Written Submission).docx

Date and Time Comment Was Submitted: 2012-02-01 09:22:50

No Duplicates.

Comment 6 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Tracy

Last Name: Woodward

Email Address: tracy.woodward@nissan-usa.com

Affiliation:

Subject: Nissan North America, Inc.

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/116-tracy_woodward.pdf

Original File Name: Tracy Woodward.pdf

Date and Time Comment Was Submitted: 2012-02-01 09:33:26

No Duplicates.

Comment 7 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Simon

Last Name: Mui

Email Address: smui@nrdc.org

Affiliation:

Subject: Natural Resources Defense Council

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/117-simon_mui.pdf

Original File Name: Simon Mui.pdf

Date and Time Comment Was Submitted: 2012-02-01 09:33:26

No Duplicates.

Comment 8 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Michael

Last Name: Lord

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

Affiliation:

Subject: Toyota

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/118-michael_lord.pdf

Original File Name: Michael Lord.pdf

Date and Time Comment Was Submitted: 2012-02-01 09:33:26

No Duplicates.

Comment 9 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

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

Subject: Tesla Motors
Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/119-diarmuid.pdf

Original File Name: Diarmuid.pdf

Date and Time Comment Was Submitted: 2012-02-01 09:33:26

No Duplicates.

Comment 10 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Uduak

Last Name: Ntuck

Email Address: Non-web submitted comment

Affiliation:

Subject: Operation Free -TNSP

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/120-uduak_ntuk.pdf

Original File Name: Uduak Ntuk.pdf

Date and Time Comment Was Submitted: 2012-02-01 09:33:26

No Duplicates.

Comment 11 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Henry

Last Name: Hogo

Email Address: Non-web submitted comment

Affiliation:

Subject: South Coast Air Quality Management District

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/121-henry_hogo.pdf

Original File Name: Henry Hogo.pdf

Date and Time Comment Was Submitted: 2012-02-01 09:33:26

No Duplicates.

Comment 12 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Shankar

Last Name: Prasad

Email Address: Non-web submitted comment

Affiliation:

Subject: Coalition for Clean Air

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/122-shankar_prasad.pdf

Original File Name: Shankar Prasad.pdf

Date and Time Comment Was Submitted: 2012-02-01 09:33:26

No Duplicates.

Comment 13 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Cruz

Last Name: Gomez

Email Address: Non-web submitted comment

Affiliation:

Subject: Consumers Union

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/124-cruz_gomez.pdf

Original File Name: Cruz Gomez.pdf

Date and Time Comment Was Submitted: 2012-02-01 09:33:26

No Duplicates.

Comment 14 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Robert

Last Name: Vinetz, MD

Email Address: rvinetz@queenscare.org

Affiliation:

Subject: Asthma Coalition of Los Angeles County

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/126-robert_vinetz.pdf

Original File Name: Robert Vinetz.pdf

Date and Time Comment Was Submitted: 2012-02-01 10:42:10

No Duplicates.

Comment 15 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Ernesto

Last Name: Pantoja

Email Address: Non-web submitted comment

Affiliation:

Subject: Laborers Local 300

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/128-ernesto_pantoja.pdf

Original File Name: Ernesto Pantoja.pdf

Date and Time Comment Was Submitted: 2012-02-01 10:42:10

No Duplicates.

Comment 16 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Kevin

Last Name: Norton

Email Address: Non-web submitted comment

Affiliation:

Subject: IBEW Local 11

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/129-kevi_norton.pdf

Original File Name: Kevi Norton.pdf

Date and Time Comment Was Submitted: 2012-02-01 10:42:10

No Duplicates.

Comment 17 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Reginald
Last Name: Modlin
Email Address: r.modlin@chrysler.com
Affiliation:

Subject: Chrysler
Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/130-reginald_modlin.pdf

Original File Name: Reginald Modlin.pdf

Date and Time Comment Was Submitted: 2012-02-01 10:42:10

No Duplicates.

Comment 18 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: David

Last Name: Friedman

Email Address: dfriedman@ucsusa.org

Affiliation:

Subject: Union of Concerned Scientists

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/131-david_friedman.pdf

Original File Name: David Friedman.pdf

Date and Time Comment Was Submitted: 2012-02-01 12:52:10

No Duplicates.

Comment 19 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Robert

Last Name: Babik

Email Address: Non-web submitted comment

Affiliation:

Subject: General Motors

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/133-robert_babik.pdf

Original File Name: Robert Babik.pdf

Date and Time Comment Was Submitted: 2012-02-01 12:52:10

No Duplicates.

Comment 20 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Mario

Last Name: Rivas

Email Address: Non-web submitted comment

Affiliation:

Subject: Operation Free

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/134-mario_rivas.pdf

Original File Name: Mario Rivas.pdf

Date and Time Comment Was Submitted: 2012-02-01 12:52:10

No Duplicates.

Comment 21 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Sean

Last Name: Carroll

Email Address: scarroll@environmentcalifornia.org

Affiliation:

Subject: Environment California

Comment:

The attachment includes 10 of 10,400 signatures. Due to the volume of the attachment only the first page of the document is attached. The hard copy is available with the Clerk of the Board in the January 26 & 27, 2012 Board Book.

Attachment: www.arb.ca.gov/lists/zev2012/135-sean_carroll.pdf

Original File Name: Sean Carroll.pdf

Date and Time Comment Was Submitted: 2012-02-01 12:52:10

No Duplicates.

Comment 22 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Judy

Last Name: Mitchell

Email Address: Non-web submitted comment

Affiliation:

Subject: California Clean Cars

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/137-judy_mitchell.pdf

Original File Name: Judy Mitchell.pdf

Date and Time Comment Was Submitted: 2012-02-01 12:52:10

No Duplicates.

Comment 23 for Zero Emission Vehicle Regulation (zev2012). (At Hearing)

First Name: Wendy

Last Name: James

Email Address: wendy@betterworldgroup.com

Affiliation:

Subject: California Clean Cars Campaign

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/138-wendy_james.pdf

Original File Name: Wendy James.pdf

Date and Time Comment Was Submitted: 2012-02-01 12:52:10

No Duplicates.

Comment 1 for Zero Emission Vehicle Regulation (zev2012) - 15-1.

First Name: John H.

Last Name: Ruge Jr.

Email Address: Non-web submitted comment

Affiliation:

Subject: Fuji Heavy Industries U.S.A, Inc. c/o Subaru

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/141-subaru.pdf

Original File Name: Subaru.pdf

Date and Time Comment Was Submitted: 2012-03-06 10:13:01

No Duplicates.

Comment 2 for Zero Emission Vehicle Regulation (zev2012) - 15-1.

First Name: Sara

Last Name: Rudy

Email Address: srudy@ford.com

Affiliation: Ford Motor Company

Subject: Ford Comments on ZEV 15-Day Notice

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/zev2012/142-ford_comments_15-day_2012_03_07.pdf

Original File Name: Ford comments 15-Day 2012_03_07.pdf

Date and Time Comment Was Submitted: 2012-03-07 12:57:20

No Duplicates.

Comment 3 for Zero Emission Vehicle Regulation (zev2012) - 15-1.

First Name: Greg

Last Name: Minor

Email Address: gminor@ferrarisf.com

Affiliation: Ferrari of San Francisco

Subject: 15-Day Notice to the ZEV and LEVIII Amendments

Comment:

Attached is my signed letter

Attachment: www.arb.ca.gov/lists/leviiighg2012/79-15_day_notice_zev_and_leviii354.pdf

Original File Name: 15 Day Notice Zev and LEVIII354.pdf

Date and Time Comment Was Submitted: 2012-03-06 12:30:43

No Duplicates.

Comment 4 for Zero Emission Vehicle Regulation (zev2012) - 15-1.

First Name: Giacomo

Last Name: Mattioli

Email Address: letizia@ferraribeverlyhills.com

Affiliation:

Subject: 2012 Amendments to the "LEV III" California Greenhouse Gas Regulation
Comment:

Dear Sir / Madam

Please find attached the letter for Ferrari Maserati Beverly Hills
/ Silicon Valley.

Kindest regards,

Giacomo Mattioli

Attachment: www.arb.ca.gov/lists/leviiighg2012/81-3.7.12_carb_new_emission_regulations_letter_of_support.pdf

Original File Name: 3.7.12 CARB new emission regulations letter of support.pdf

Date and Time Comment Was Submitted: 2012-03-07 10:06:17

No Duplicates.

Comment 5 for Zero Emission Vehicle Regulation (zev2012) - 15-1.

First Name: David
Last Name: Nordberg
Email Address: nordberg.dave@deq.state.or.us
Affiliation:

Subject: 2012 Amendments to the California Zero Emission Vehicle Regulation
Comment:

Please find the attached comment letter from Andrew Ginsburg.

If you have any questions, please feel free to either call Dave Nordberg or Carol Thornberg.

Thank you.
Carol Thornberg
Executive Assistant for
Andy Ginsburg ~ Air Quality DA
Oregon Department of Environmental Quality
(503) 229-5775
thornberg.carol@deq.state.or.us

Attachment: www.arb.ca.gov/lists/zev2012/145-california_zev_regulation.pdf

Original File Name: California ZEV Regulation.pdf

Date and Time Comment Was Submitted: 2012-03-08 11:03:59

No Duplicates.

Comment 6 for Zero Emission Vehicle Regulation (zev2012) - 15-1.

First Name: Robert

Last Name: Bienenfeld

Email Address: Robert_Bienenfeld@ahm.honda.com

Affiliation: American Honda Motor Co., Inc.

Subject: Honda Comments on ZEV 15-Day Notice

Comment:

Please see attached

Attachment: www.arb.ca.gov/lists/zev2012/147-honda_15-day_zev_notice_comments.pdf

Original File Name: Honda 15-Day ZEV Notice Comments.pdf

Date and Time Comment Was Submitted: 2012-03-08 15:23:44

No Duplicates.

Comment 7 for Zero Emission Vehicle Regulation (zev2012) - 15-1.

First Name: Frank

Last Name: Krich

Email Address: fak6@chrysler.com

Affiliation: Chrysler Group LLC

Subject: Chrysler ZEV 15-Day Notice Comments

Comment:

See attached file for Chrysler's comments on ARB's ZEV 15-Day Notice.

Attachment: www.arb.ca.gov/lists/zev2012/148-chrysler_zev_15_day_notice_comments.pdf

Original File Name: Chrysler ZEV 15 Day Notice Comments.pdf

Date and Time Comment Was Submitted: 2012-03-08 15:33:20

No Duplicates.

Comment 8 for Zero Emission Vehicle Regulation (zev2012) - 15-1.

First Name: John
Last Name: Atkinson
Email Address: jatkinson@vng.co
Affiliation: VNG

Subject: Comments on ACC
Comment:

Please find attached VNG's comments on proposed changes to both the ZEV and CFO regulations. We hope to discuss these comments in further detail at your convenience.

Best,
John Atkinson
Manager, Public Policy
VNG.co
jatkinson@vng.co
646-734-2709

Attachment: www.arb.ca.gov/lists/zev2012/150-vng-acc_comments.pdf

Original File Name: VNG-ACC Comments.pdf

Date and Time Comment Was Submitted: 2012-03-08 16:45:28

No Duplicates.

Comment 9 for Zero Emission Vehicle Regulation (zev2012) - 15-1.

First Name: Robert

Last Name: Bienenfeld

Email Address: Robert_Bienenfeld@ahm.honda.com

Affiliation: American Honda Motor Co., Inc.

Subject: Honda Comments on LEV & GHG 15-Day Notice

Comment:

Please see attached.

Attachment: www.arb.ca.gov/lists/leviiighg2012/87-honda_15-day_lev_notice_comments.pdf

Original File Name: Honda 15-Day LEV Notice Comments.pdf

Date and Time Comment Was Submitted: 2012-03-08 16:00:57

No Duplicates.