

Subject: Public Hearing Agenda Item 20-7-2: Consideration of Proposed Procedures for the Exemption of Add-On and Modified Part(s) for On-Road Vehicles/Engines

Ladies and Gentlemen of the Air Resources Board:

First, I want to point out that in addition to being a vital part of California “car culture” and, correspondingly an important part of the small business economy, it is also the pathway to vehicle re-certification that affords independence to literally 100’s of thousands of mobility impaired drivers and passengers throughout the California and the Country at large.

That being said, most personal use wheelchair accessible vehicles (PWAV), paratransit (PT) and non-emergency medical transportation (NEMT) trips include a driver and up to two (2) passengers including one or more in a wheelchair resulting in a payload requirement under 1,000 lb. Accordingly, most PT and NEMT vehicles are based on a minivan or class 2 vehicle platform.

Most firms currently producing electric cargo vehicles are not pursuing smaller than class 3 due to the more stringent FMVSS requirements applicable to smaller vehicles. However, the excess weight required to meet the class 3 capacity requirements results in a vehicle that is too heavy with insufficient range and gradeability to make a suitable paratransit vehicle. Combined with the added burden of a suitable HVAC system, the class 3 vehicles currently available will barely make 100 miles on a charge and lack the gradeability necessary to satisfactorily climb a hill like the one at the Griffith Observatory.

Though there are electric automobiles currently available that can easily manage 250 miles on a charge and pull the hill at the Griffith Observatory with the AC at full blast, the drive components (motors, batteries, controllers, etc.) are not available in the aftermarket. Accordingly, though technology exists to make a suitable class 2 EV, doing so requires combining components from multiple manufacturers and recertifying a vehicle originally certified under another set of emissions standards.

Moreover, as a suitable class 2 or minivan EV platform does not currently exist, there is a gap in the electric vehicle fleet leaving PWAV users and PT and NEMT providers no alternative for the over 3 billion trips or nearly 30 billion US road miles they currently run, allowing on the order of 28 billion pounds of CO2 to be released into the atmosphere. The availability of kit like the one proposed by Mr. Pfeiffer of Maxwell Vehicles would be a great first step toward a zero emission future for the Mobility Transportation Sector.

Thank you very much in advance for your consideration in helping move the paratransit fleet toward a cleaner, greener future.

Kind Regards,
Stanton D. Saucier, PE
President – MPower Engineering, Inc.