



Oregon
Environmental
Council
It's Your Oregon

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Richard Corey, Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

October 20, 2014

Re: Comments to Proposed Amendments to Sections 1962.1 and 1962.2, Title 13, California Code of Regulations

Dear Mr. Corey:

As a membership-based organization representing thousands of Oregonians who demand clean air and climate action, the Oregon Environmental Council (OEC) is writing in support of maintaining strong ZEV rules. OEC was a lead advocacy group that fought for the Clean Car Standards in Oregon, and it's important that we maintain the ability of the program to deliver environmental and health benefits as well as provide a strong market signal.

We are very concerned about proposals to reduce the targets and delay implementation for Intermediate Vehicle Manufacturers (IVMs) for the following reasons:

- The original targets have been known for years and IVMs have had time to prepare.
- Oregon is working to get more EVs on the road. We have pledged to work with seven other states to put 3.3 million ZEVs on the road by 2025. In 2015, we will have legislative proposals to reauthorize the Clean Fuels Program and consider EV incentives—two policies that promote EV use.
- The ZEV program already provides flexibility—including the ability for manufacturers to purchase credits (which never expire) from companies that over-comply—as well as the pooling proposal under consideration.
- A strong ZEV program is critical for Oregon to meet our climate and air quality goals. Oregon's Statewide Transportation Strategy calls for dramatic increases in electric vehicle market share, the 10-Year Energy Action Plan supports fleet conversion to cleaner fuels, and many air quality plans depend on a cleaner vehicle pool. Undermining ZEV undermines these critical goals.
- IVMs are already proving that high ZEV car sales are possible.

We request that the Board consider rejecting the proposals to extend the transition time from three to five years, oppose reducing the stringency for IVM requirements, and oppose extending the deficit make up period. We appreciate the work that Board and staff have done and continue to do to support cleaner cars.

Sincerely,

Jana Gastellum
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