

October 15, 2013

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

Re: ZEV Program and Heavy-Duty Vehicles

Dear Chairperson Nichols and Board,

Electric Vehicles International (EVI) respectfully requests the California Air Resources Board (ARB) consider modifications to the Zero Emission Vehicle Regulation (ZEV program) to apply to medium- and heavy-duty vehicles over 14,000 pounds, as large vehicles contribute the majority of on-road, cancer-causing, toxic diesel particulate pollution and associated exposures affecting communities in our state.

EVI is a 20-year pioneer in alternative fuel technologies and a leading manufacturer of zero-emission vehicles. In 2009, EVI moved our headquarters, vehicle assembly, and jobs from Mexico to Stockton, California. We moved to California to help transition the state's large fleet of heavy-duty, dirty diesels to low-carbon, zero-emission alternatives. We were attracted in part by California's leading air quality policies, including AB 32, the Low Carbon Fuel Standard and the ZEV program. We strongly support the goals of the ZEV program and applaud programs that provide needed economic incentives to help achieve California's health based air quality standards and aggressive greenhouse gas emission goals.

Currently, the ZEV program does not apply to medium- and heavy-duty vehicles over 14,000 pounds. Large vehicles are main contributor of diesel particulate pollution, NOx, and other smog precursors that harm the health of Californians. NOx emissions from large diesel trucks and from diesel and CNG buses need to be substantially reduced or eliminated to achieve smog attainment in South Coast by 2021. Refining the ZEV program to include zero-emission vehicles over 14,000 pounds would help achieve that goal, accelerate ZEV technology advancement in all size categories, and help implement the Governor's Executive Order to deploy 1.5 million zero-emission cars, trucks and buses by 2025.

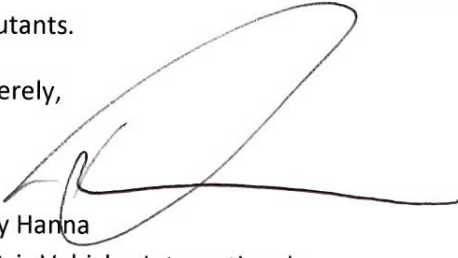
Allowing auto manufactures to purchase ZEV credits from manufacturers of larger ZEVs and enabling these credits to fulfill light-duty manufacturers' ZEV requirements will provide a substantial net air quality benefits. As a result of the sustained regulatory efforts by ARB and the US EPA, new light duty cars have limited criteria pollutants -- NOx and PM emissions from new light-duty cars sold in California are now largely controlled. While California's diesel fleet is also getting cleaner, existing vehicles over 14,000 pounds, which typically stay in use longer than light-duty vehicles, are still relatively dirty. Allowing the ZEV program to include larger vehicles will leverage private dollars to help modernize the fleet, clean by air by eliminating toxic diesel emissions, and alleviate toxic exposures.

During an ARB AQIP board meeting earlier this year, Boardmember Dr. Daniel Sperling called upon all of us to be creative and find private market mechanisms over the next couple months to help support the

AQIP program, including supporting HVIP type programs. Adjusting the existing ZEV program to include displacement of larger, more polluting vehicles offers a potential response to his call. With limited AQIP funds, it is more important than ever to tailor policies to achieve the greatest reduction of toxic diesel particulates and provide a sustained spark to help achieve self-sustaining ZEV car, truck and bus deployments throughout California. To support the expanded deployment of California ZEV technologies, we ask that zero emission, heavy-duty vehicles be allotted credit under the ZEV Program to help provide market-based incentives to accelerate the replacement of large, dirty diesel trucks.

We thank you for the opportunity to provide comments on the Zero Emission Vehicle (ZEV) Program and appreciate the efforts of the California Air Resources Board to reduce GHG and health-based air pollutants.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Ricky Hanna', with a large, sweeping loop at the end.

Ricky Hanna
Electric Vehicles International