



November 1, 2013

Mary Nichols, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: CALSTART Comments on Discussion Draft of First Update to AB 32 Scoping Plan

Dear Chair Nichols,

CALSTART appreciates the opportunity to offer comments on the draft of the First Update to the AB 32 Scoping Plan. CALSTART has supported AB 32 since its passage and continues to promote clean transportation policies that will move California closer to the 2020 goals and beyond. We are generally supportive of the draft Scoping Plan update and would like to offer some initial thoughts on the draft plan.

CALSTART is a nonprofit clean transportation technologies consortium with offices in Pasadena and the San Francisco Bay Area. We have roughly 150 member companies producing a wide variety of advanced, low carbon transportation technologies. Many of these companies are located here in California, due in large part to the commitment California has demonstrated to move to a cleaner, lower carbon transportation future through policies such as AB 32.

We would like to thank staff and the Board for the work that has gone into AB 32 implementation to date and for the draft Scoping Plan update. We generally think this plan hits on the key issues the state is facing and creates the right framework for thinking through these issues. In the interest of time, we are limiting our written comments at this time to high level, high priority issues for the clean transportation sector.

Comprehensive focus on freight and heavy duty vehicles. We were pleased to see the priority that ARB has placed on advances in freight. This is a complicated area that requires a comprehensive plan with creative strategies for driving technology development and adoption. We were also pleased to see acknowledgement of the fact that funding is needed for demonstrations and pilot deployments in addition to existing incentives for commercial deployment. We do believe that the heavy duty vehicle focus should be broadened out to include off-road vehicles and zero-emission buses.

Acknowledgement of the need for expanded and extended incentives for zero- and near-zero emission vehicles. Existing rebates for light duty vehicles are effective but they are oversubscribed. On the medium and heavy duty vehicle side, we agree that additional investment is needed and that this investment must include demonstrations and pilot deployments. We also note that additional attention and investment may be needed to drive deployment, ensure adequate infrastructure, and address consumer acceptance barriers.

Longer term target and plan to look at “moving past 2020.” Longer term planning and certainty are needed to provide direction for investments in this sector. We are pleased to see ARB looking ahead to longer term needs and we plan to remain engaged in this discussion.

**Clean Transportation
Technologies and Solutions**

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Inclusion of low-carbon fuels in the plan and investment discussions. California is making progress on low carbon biofuels and renewable natural gas. We support continued implementation of California's fuels policies and agree that continued investment is needed in this area. We also agree that these fuels are particularly important outside of the light duty vehicle sector.

Zero emission bus deployment and learning. We believe that targeted investment in zero emission buses would yield substantial emissions and technology advancement benefits while also supporting the goals of SB 535. In addition to the direct community and emissions benefits that broad deployment of zero emission buses would provide, progress on heavy-duty zero emission technologies in the bus sector will have "spillover benefits" for freight and other heavy-duty applications.

CALSTART appreciates CARB's attention to the transportation sector. We look forward to working with ARB and other stakeholders to develop more concrete plans and investment strategies as this process moves forward. This update is an important step for maintaining momentum and meeting AB 32 goals.

Sincerely,

Jamie Hall
Policy Director