

May 24-25, 2007 . Chung Liu

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May 23, 2007

Dr. Robert Sawyer Chairman California Air Resources Board 1001 I Street Sacramento, CA 95812

Dear Chairman Sawyer,

As you know, the South Coast Air Quality Management District (SCAQMD) has the worst air quality in the nation, and, as a result, our residents need the strongest possible mobile source control policies. It is in this spirit that SCAQMD staff provide the following recommendations for consideration during the Zero Emission Vehicle (ZEV) regulation review.

The SCAQMD staff is in agreement with the Independent Expert Panel review, which identifies plug-in hybrid electric vehicles as having "the potential to provide significant direct societal benefits" and that all electric range "could have a significant [detrimental] impact on the early success of the technology" (Executive Summary, p11). We urge the CARB Board provide greater incentives for blended-mode plug-in hybrid electric vehicles as a means to enabling true ZEVs. It is no accident that the Panel's vision of a plug-in fuel cell vehicle has since been demonstrated by Ford and GM.

The SCAQMD staff also urges the CARB Board to include greenhouse gas emissions and fuel economy incentives as part of the ZEV credit structure. This is an opportunity for CARB to address, in the near-term, criteria pollutants, energy diversity, and greenhouse gas emissions. We believe that multiple goals care aligning that could help accelerate deployment of cleaner, more efficient vehicles. But in order to realize regional, state, national and global benefits, the regulation must be complimentary and not trade one concern for another. The best and most efficient mechanism to accomplish this is under one umbrella structure, which could be the ZEV.

Finally, we welcome CARB participating and leveraging the technology development and demonstration activities at the SCAQMD. Our programs to develop hybrid electric vehicles, plug-in and hydraulic hybrids, as well as alternative fuel technologies all fit within the framework toward ZEV and the recommendations outlined above.

We hope the CARB Board will approve our recommendations and send the signal that California (a) still believes in zero emission vehicles, (b) has pathways to enable their commercialization, and (c) understands the stakes are not just regional but global.

Sincerely,

Barry R. Wallerstein, D.Env.

Executive Officer

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