



May 23, 2007

The Honorable Robert F. Sawyer, Ph.D
Chairman, California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Status Report on California Air Resources Board's Zero Emission Vehicle Program May 24, 2007 Board Meeting, Agenda Item #07-5-5

Dear Chairman Sawyer:

On behalf of NRDC (Natural Resources Defense Council), which has 1.2 million members and activists, 250,000 of whom are Californians, I am pleased to provide comments regarding the Air Resources Board's review of the Zero Emission Vehicle Program.

We believe the Zero Emission Vehicle (ZEV) program does not need major revisions at this time. We strongly support maintaining the overall requirements for the truly advanced technology classes of vehicles, the Advanced-Technology Partial Zero Emission Vehicles (AT-PZEVs) and ZEVs. With the recent passage of AB 32, we believe it is more important than ever to maintain the program to ensure production of advanced technology vehicles that contribute simultaneously to reducing global warming and smog-forming. Ensuring successful commercialization for advanced technology vehicles requires regulatory stability in order for automakers, suppliers and fuel providers to have the necessary certainty to maintain their investments. Therefore, before taking any action to consider changes to the program, we urge the Board to carefully consider its action and make the absolute minimum changes necessary at this time.

The Zero Emission Vehicle program has been a great success. It is responsible for moving advanced vehicle technology from the laboratory to the road. AT-PZEVs, such as hybrid electric vehicles, are now sold nationally in the hundreds of thousands each year, and as the Independent Expert Panel noted, these vehicles "are providing major support to future mass market ZEVs by continuing to stimulate advances in electric drive systems, electric accessories, and battery technologies. Also, they are increasing customer awareness of electric drive technology and the associated benefits." Even with the success of AT-PZEVs, the ZEV program must continue to focus on the ultimate objective of commercialization of true zero emission vehicles.

If the Board chooses to consider revising the ZEV Program, the changes should be narrowly targeted towards revisions that will strengthen, not weaken the program's

progress towards true zero emissions. One example would be to examine incentives for plug-in hybrid electric vehicles (PHEVs). PHEVs are an evolution of HEVs that can further promote pure ZEV technology. According to the Expert Panel, PHEVs “may foster future mass market [battery electric vehicles] by stimulating energy battery development and conditioning mass market customers to accept plugging in.” Providing greater incentives for PHEVs can help accelerate the commercialization of this important technology.

NRDC appreciates the Board’s consideration of these comments and we look forward to the continued success of the ZEV Program with the ultimate focus on getting zero emission vehicles on the road.

Sincerely,

A handwritten signature in black ink, appearing to read "Luke R. Tonachel". The signature is fluid and cursive, with the first name "Luke" being the most prominent.

Luke Tonachel
Vehicles Analyst