



07-5-5
May 24-25, 2007

Danielle Fugere

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 (ZEV)
Vehicle Program May 24, 2007 Board Meeting, Agenda Item #07-5-5

Dear Chairman Sawyer:

Friends of the Earth appreciates the opportunity to comment on the Zero Emission Vehicle (ZEV) program and Status Report. The ZEV program has been a clear success in reducing emissions and advancing clean vehicle technology. Based on this success, we do not believe that it is necessary or appropriate to weaken ZEV's requirements.

In fact, we believe that the ZEV regulations should be strengthened. We support staff's recommendation that options be explored to further incentivize the production of Plug-In Hybrid Electric Vehicles. Plug-in hybrids, which allow various amounts of zero-emission driving (depending on the battery size), have significant near-term commercialization potential. ZEV incentives can play a significant role in accelerating this commercialization. Further, we advocate that no options with regard to plug-in credits be foreclosed at this time.

We also support staff's recommendation that battery electric and fuel cell vehicles be given equal ZEV credit treatment. Both technologies are zero emission and should be credited equally. This benefits automakers in allowing further compliance flexibility.

Finally, we request full transparency of the ZEV regulatory compliance system. Denying the public access to information about how, when, and on what basis credits are issued creates public distrust in the regulatory system and prevents meaningful public participation in proceedings such as this. We ask that the Board take action to make ZEV compliance information fully available to the public.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Danielle R. Fugere".

Danielle R. Fugere
Regional Program Director