

I am Marc Geller, representing the San Francisco Electric Vehicle Association. We are obviously extremely supportive of the Zero Emission Vehicle Program. However it appears that structural preferences and conflicts of interest within the ARB are preventing the achievement of our mutual goals of putting ZEVs on the road.

As I mention every time I appear before this Board, I drove here today from San Francisco in an electric car charged with solar power. 60,000 miles and it still works great. I thank you.

But the haunting trajectory of greenhouse gas emissions, and the current impact of petroleum addiction on our pocketbooks and politics demand ZEVs for others clamoring for choice. The courageous and forward-looking actions of this Board in the past have already proven that beginning the process of making ZEVs available to regular consumers *is* possible. In order to get back on track CARB must not only maintain the Phase III ZEV numbers, it must stop treating ZEV technologies in an unequal manner.

To see this structural preference one need look no further than the ARB homepage, where hydrogen and fuel cells – not ZEVs - receive prominent placement, with no equivalent recognition of battery electrics. The same members of staff that administer the ZEV program and make recommendations to this Board are charged with promoting and administering the hydrogen highway and fuel cell projects. A bias toward one technology is reflected in the titles and job descriptions of many staffers who wrote the recommendation you are considering today that give a fuel cell vehicle more credit than a battery electric vehicle with the same range. We all hoped that hydrogen fuel cell vehicles had been able to achieve rapid and economic

deployment. Everyone interested in electric drive and its environmental benefits maintains a strong interest in the seductive promise of hydrogen and fuel cells. However we cannot be blind to the actual pace of advancement of this technology, and we must not prevent a proven and more affordable technology – battery electric vehicles – from making the positive near term benefit this Board desires. There is no logic to a credit preference for the technologies that will not put ZEV vehicles on the road in the near term.

This Board's decisions should be based on a performance standard, an environmental benefits standard. When Alan Lloyd was Chair, he perceived a bias toward BEVs. Automakers claimed they couldn't produce "these increasing numbers of the battery electric vehicles." The automakers favored a move toward hydrogen fuel cell vehicles, and he said: "Is our job to clean the air? Or is it to force a...type of technology on the road?" As the Chair of CARB and the then recently named director of the Fuel Cell Partnership – an apparent conflict of interest itself - the move away from BEVs seemed perhaps logical. But now the tables have turned. Automakers are now saying they can't make thousands of FCVs, - at \$1 million a pop it's not surprising. But the battery electric cars CARB put on the road that weren't shredded continue to perform well. Battery electrics have proven themselves over time, and millions of miles in consumers' hands. This board has the opportunity to lead once again. When the California government leads, California's citizens respond. The SFEVA calls upon the board to reject the staff recommendation to lower by 90% the number of ZEVs and to demand parity for ZEV technologies. Thank you.