



Gina McCarthy
Commissioner

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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PHONE: 860-424-3001



March 27, 2008

Mary D. Nichols, Chairman
California Air Resources Board
1001 I Street
Sacramento, California 95814

**Re: California Environmental Protection Agency Air Resources Board Staff
Report: Initial Statement of Reasons 2008 Proposed Amendments to the
California Zero Emission Vehicle Program Regulations**

Dear Chairman Nichols:

Thank you for the opportunity to comment on the recently proposed changes to the Zero Emission Vehicle (ZEV) program. The Connecticut Department of Environmental Protection (DEP) appreciates the leadership role of the California Air Resources Board (CARB) in developing this program and we are firmly committed to seeing this program through to successful implementation. DEP is concerned, however, that CARB's proposed changes may significantly delay the introduction of battery electric and fuel cell vehicles into Connecticut and throughout the Northeast. While Connecticut is relatively new to this program, we understand that some of the northeast states have been waiting more than a decade for the start of the ZEV program. As a result, we strongly believe the program should move ahead without further delays. Specifically, we request that CARB reconsider the proposed change to the ZEV program, which would remove the battery electric and fuel cell vehicle requirements in Section 177 states until as late as 2017. The proposed changes also have the potential to significantly reduce the number of plug-in hybrid electric vehicles that will be introduced into the Northeast fleet.

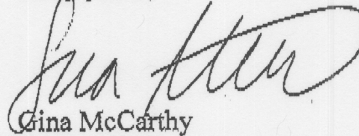
The advanced technology vehicle requirements of the Low Emission Vehicle (LEV) program are of utmost importance to Connecticut and the other Section 177 states. The program requires the introduction of advanced technology vehicles that emit no criteria air pollutants and substantially lower levels of greenhouse gas (GHG). The ZEV program is an integral part of northeast state efforts to improve air quality and public health in our region and to reduce GHG emissions that contribute to global warming and climate change.

We respectfully request that California assist Connecticut and the other Section 177 states in our efforts to implement the LEV program in a manner that maximizes its

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public health and environmental benefits. For the sake of our environment, we need these new vehicles, not just credits based on their use in California. CARB can do this by maintaining the current requirements for the ZEV program and related travel provisions in Section 177 states.

Truly yours,

A handwritten signature in cursive script, appearing to read "Gina McCarthy".

Gina McCarthy
Commissioner

CC: NESCAUM Commissioners and Air Directors