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Assembly California Legislature



IRA RUSKIN ASSEMBLYMEMBER, TWENTY-FIRST DISTRICT

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OFFICE OF THE CHAIRMAN AIR RESOURCES BOARD

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Ms. Mary Nichols Chairperson California Air Resources Board P.O. Box 2815 Sacramento, California 95812

RE: ZERO EMISSION VEHICLE REGULATION

Dear Chairperson Nichols:

I write to you in response to the recent changes to the Zero Emission Vehicle (ZEV) program. While I appreciate the need to update the regulation, reducing the number of pure ZEV vehicles from 25,000 to 7,500 is far too precipitous. This drastic cutback will have negative impacts on our environmental and greenhouse gas (GHG) reduction goals, our state's economic development, and the integrity of the ZEV program. I urge you to reconsider.

Such a sharp reduction in pure ZEVs undermines the very purpose of the program—it weakens the push for technology. More importantly, it destabilizes the certainty in future technology markets that is essential to attract investment, forge partnerships, and create the infrastructure necessary to propel those new innovations from smaller scale demonstration into the commercial market.

A recent report by the Union of Concerned Scientists estimates California will need between 350,000 and 400,000 pure ZEVs on the road by 2020 in order to meet our 2050 GHG reduction goals. I fully expect CARB's 2014 redesign of the ZEV program to reflect an aggressive effort to meet our 2020 and 2050 emission reduction targets.

Yet only requiring 7,500 ZEVs by 2014 will not be enough on the front end to meet those long term goals. Even if the board intends to hasten the pace for ZEVs when it redesigns the ZEV program for 2014 and beyond, the sharp reduction in ZEVs now will stifle investment and momentum that we will need in 2014.

Moreover, as I stated in previous letters to CARB dated April 23, 2007 and March 26, 2008, numerous electric vehicle manufacturers and suppliers are based in California. Their development plans are primarily based upon the opportunities provided under the original ZEV mandate. The recent changes essentially pull the rug out from under these efforts, thus rendering thousands of California jobs and several billion dollars in state revenues at risk.

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I believe your recent changes to the ZEV program were made in good faith, and I applaud your inclusion of plug-in hybrid vehicles. But the inclusion of plug-in hybrids should not be at the expense of pure ZEVs. Doing both is not only possible, it is essential to meet our short and long term GHG reduction targets.

I strongly urge you to reinstate the mandate of 25,000 pure ZEV vehicles by 2014.

Sincerely,

Assemblymember Ira Ruskin, Chair

Assembly Budget Subcommittee #3 on Resources