ELECTRIC VEHICLES INTERNATIONAL
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January 17, 2011

Mary Nichols, Chairman
California Air Resources Board
1001 "I" Street
P.O. Box 2815
Sacramento, CA 95812

Re: ZEV Program and Heavy-Duty Vehicles

Dear Chairman Nichols and Board Members,

Electric Vehicles International (EVI) is a 20-year pioneer in alternative fuel technologies and a leading manufacturer of zero-emission vehicles. In 2009, EVI moved our headquarters, vehicle assembly, and jobs from Mexico to Stockton, California. We moved to California to help transition the state's large fleet of heavy-duty, dirty diesels to low-carbon, zero-emission alternatives. We were attracted in part by California's leading air quality policies, including AB 32, the Low Carbon Fuel Standard and the California Air Resources Board's (CARB) Zero Emission Vehicle (ZEV) program. We strongly support the goals of the ZEV program and applaud programs that provide needed economic incentives to help achieve California's health based air quality standards and aggressive greenhouse gas emission goals.

Currently, the ZEV program does not apply to medium- and heavy-duty vehicles over 14,000 pounds. Large vehicles contribute the majority of on-road, cancer-causing, toxic diesel particulate pollution and associated exposures affecting communities in our state. In addition, they emit a sizable quantity of NOx and other smog precursors that harm the health of Californians. Refining the ZEV program to include zero-emission vehicles over 14,000 pounds would achieve the greatest tons per dollar reductions associated with the program and accelerate the program's health benefits.

Allowing auto manufactures to purchase ZEV credits from manufacturers of larger ZEVs and allowing these credits to fulfill light-duty manufacturers' ZEV requirements will provide a substantial net air quality benefit. As a result of the sustained regulatory efforts by CARB and the US EPA, new light duty cars are now very clean for criteria pollutants – NOx and PM emissions from new light-duty cars sold in California are now largely controlled. While California's diesel fleet is also getting cleaner, existing vehicles over 14,000 pounds, which typically stay in use longer than light-duty vehicles, are still relatively dirty. Allowing the ZEV program to include larger vehicles will leverage private dollars to help modernize the fleet and eliminate toxic diesel emissions, cleaning the air and alleviating toxic exposures.

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In our current economic climate, it is more important than ever to tailor policies to achieve the greatest reduction of toxic diesel particulates as well as NOx and GHG emissions per dollar invested. To support the expanded development of California ZEV technologies and associated California jobs, we ask that California-manufactured, zero emission, heavy-duty vehicles be allotted credit under the ZEV Program to help sustain new job creation within our state and provide market-based incentives to accelerate the replacement of large, dirty diesel vehicles. We strongly believe that allowing heavy-duty vehicles the ability to earn ZEV Credits will serve as a financial catalyst that will help speed the early market introduction of zero emission heavy duty trucks in California.

We thank you for the opportunity to provide comments on the Zero Emission Vehicle (ZEV) Program and appreciate the efforts of the California Air Resources Board to reduce GHG and health-based air pollutants.

Sincerely,

Ricky Hanna
President and CEO
Electric Vehicles International

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