

July 20, 2016

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: ZEV Requirements in Section 177 States

Dear Mary Nichols:

As lead environmental agency officials in states that are implementing the California Advanced Clean Cars rules, including the Zero Emission Vehicle (ZEV) requirements, and who are partners with California in the development and implementation of the Multi-State ZEV Action Plan, we write to stress the importance of ensuring that robust and binding ZEV requirements take effect in our states.

Our states, like California, have adopted aggressive greenhouse gas (GHG) emission reduction goals. Transportation is the largest source of GHG emissions in our states, and the most difficult sector to control as emissions continue to increase. For this reason, transportation electrification is a key strategy to achieving our climate goals. The Clean Air Act, however, precludes us from adopting vehicle emission standards that differ from California's. Accordingly, decisions made by the Air Resources Board in the course of the ZEV mid-term review will have a significant bearing on our efforts to support clean transportation and meet our state GHG goals.

Regulatory certainty is critical for both the automobile manufacturers and the states to effectively plan and manage the transition to wide spread transportation electrification. Due to the structure of the current regulation, there has not yet been a binding ZEV sales requirement in our states.¹ The binding ZEV sales requirements, set to begin in 2018, are critical to maintain the certainty necessary to drive both continued investments and innovations by the automobile manufacturers. Any further delay would undermine the certainty that automobile manufacturers, utilities, charging providers, and others need for effective planning, and would put at risk the millions of dollars our states have invested in ZEV readiness. States, stakeholders, and the automobile industry are working together in an unprecedented manner to build a ZEV market. Regulatory certainty and consistency is a critical element to this collaborative effort.²

To be clear, our states are not relying on the ZEV mandate alone to transform the transportation sectors. Since the 2012 ZEV amendments, we have been working on many fronts with multiple stakeholders to prepare our markets for ZEVs. Together our states continue to add to the

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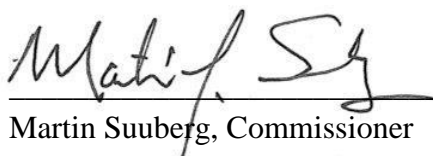
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For the foregoing reasons, we urge you to avoid any changes to the ZEV regulation that would reduce or delay ZEV sales requirements in our states.

Sincerely,



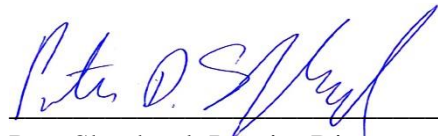
Robert Klee, Commissioner
Connecticut Dept. of Energy & Environmental Protection



Martin Suuberg, Commissioner
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Pete Shepherd, Interim Director
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Janet Coit, Director
Rhode Island Department of Environmental Management



Deb Markowitz, Secretary
Vermont Agency of Natural Resources

July 20, 2016

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: ZEV Requirements in Section 177 States

Dear Sandra Berg:

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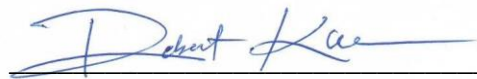
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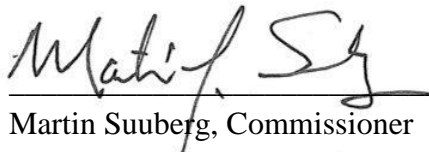
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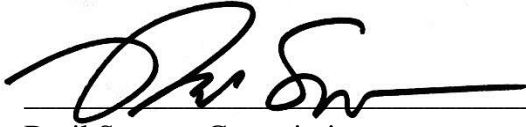
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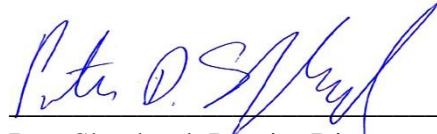
Robert Klee, Commissioner
Connecticut Dept. of Energy & Environmental Protection



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Rhode Island Department of Environmental Management



Deb Markowitz, Secretary
Vermont Agency of Natural Resources

July 20, 2016

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: ZEV Requirements in Section 177 States

Dear John R. Balmes, M.D.:

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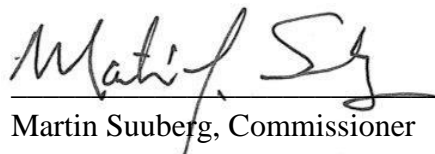
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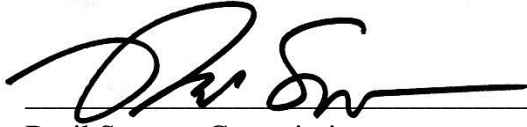
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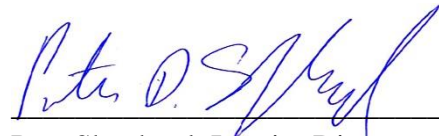
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Deb Markowitz, Secretary
Vermont Agency of Natural Resources

July 20, 2016

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: ZEV Requirements in Section 177 States

Dear Hector De La Torre:

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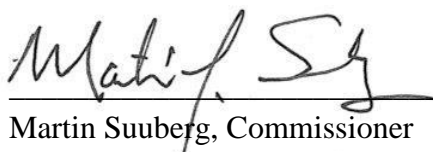
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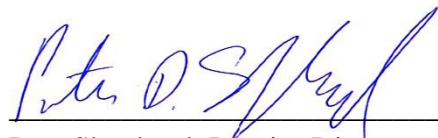
Robert Klee, Commissioner
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Deb Markowitz, Secretary
Vermont Agency of Natural Resources

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Re: ZEV Requirements in Section 177 States

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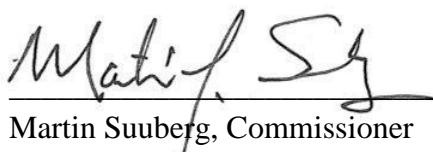
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Deb Markowitz, Secretary
Vermont Agency of Natural Resources

July 20, 2016

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: ZEV Requirements in Section 177 States

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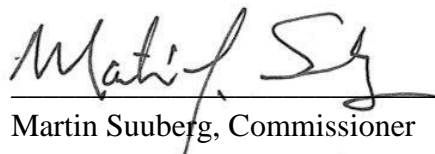
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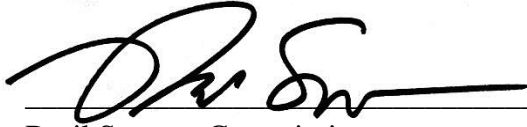
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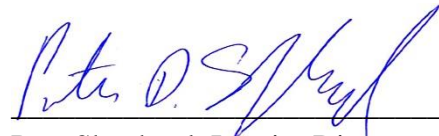
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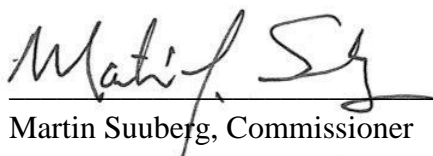
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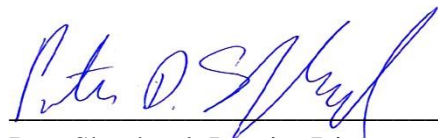
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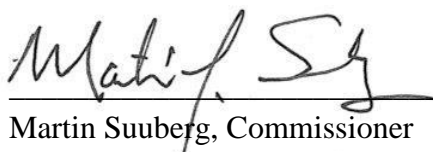
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For the foregoing reasons, we urge you to avoid any changes to the ZEV regulation that would reduce or delay ZEV sales requirements in our states.

Sincerely,



Robert Klee, Commissioner
Connecticut Dept. of Energy & Environmental Protection



Martin Suuberg, Commissioner
Massachusetts Department of Environmental Protection



Basil Seggos, Commissioner
New York Department of Environmental Conservation



Pete Shepherd, Interim Director
Oregon Department of Environmental Quality



Janet Coit, Director
Rhode Island Department of Environmental Management



Deb Markowitz, Secretary
Vermont Agency of Natural Resources

July 20, 2016

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: ZEV Requirements in Section 177 States

Dear Mrs. Barbara Riordan:

As lead environmental agency officials in states that are implementing the California Advanced Clean Cars rules, including the Zero Emission Vehicle (ZEV) requirements, and who are partners with California in the development and implementation of the Multi-State ZEV Action Plan, we write to stress the importance of ensuring that robust and binding ZEV requirements take effect in our states.

Our states, like California, have adopted aggressive greenhouse gas (GHG) emission reduction goals. Transportation is the largest source of GHG emissions in our states, and the most difficult sector to control as emissions continue to increase. For this reason, transportation electrification is a key strategy to achieving our climate goals. The Clean Air Act, however, precludes us from adopting vehicle emission standards that differ from California's. Accordingly, decisions made by the Air Resources Board in the course of the ZEV mid-term review will have a significant bearing on our efforts to support clean transportation and meet our state GHG goals.

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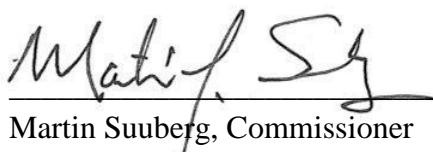
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Sincerely,



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Connecticut Dept. of Energy & Environmental Protection



Martin Suuberg, Commissioner
Massachusetts Department of Environmental Protection



Basil Seggos, Commissioner
New York Department of Environmental Conservation



Pete Shepherd, Interim Director
Oregon Department of Environmental Quality



Janet Coit, Director
Rhode Island Department of Environmental Management



Deb Markowitz, Secretary
Vermont Agency of Natural Resources

July 20, 2016

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: ZEV Requirements in Section 177 States

Dear Ron Roberts:

As lead environmental agency officials in states that are implementing the California Advanced Clean Cars rules, including the Zero Emission Vehicle (ZEV) requirements, and who are partners with California in the development and implementation of the Multi-State ZEV Action Plan, we write to stress the importance of ensuring that robust and binding ZEV requirements take effect in our states.

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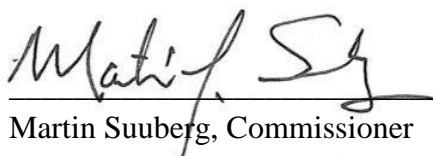
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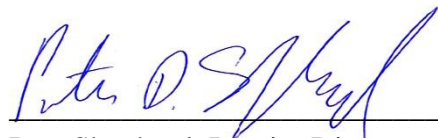
Robert Klee, Commissioner
Connecticut Dept. of Energy & Environmental Protection



Martin Suuberg, Commissioner
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Basil Seggos, Commissioner
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Pete Shepherd, Interim Director
Oregon Department of Environmental Quality



Janet Coit, Director
Rhode Island Department of Environmental Management



Deb Markowitz, Secretary
Vermont Agency of Natural Resources

July 20, 2016

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: ZEV Requirements in Section 177 States

Dear Phil Serna:

As lead environmental agency officials in states that are implementing the California Advanced Clean Cars rules, including the Zero Emission Vehicle (ZEV) requirements, and who are partners with California in the development and implementation of the Multi-State ZEV Action Plan, we write to stress the importance of ensuring that robust and binding ZEV requirements take effect in our states.

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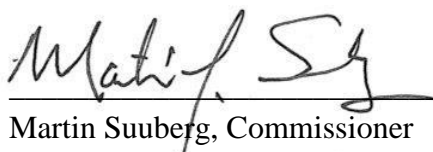
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Sincerely,



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Martin Suuberg, Commissioner
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Pete Shepherd, Interim Director
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Janet Coit, Director
Rhode Island Department of Environmental Management



Deb Markowitz, Secretary
Vermont Agency of Natural Resources

July 20, 2016

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: ZEV Requirements in Section 177 States

Dear Alexander Sherriffs, M.D.:

As lead environmental agency officials in states that are implementing the California Advanced Clean Cars rules, including the Zero Emission Vehicle (ZEV) requirements, and who are partners with California in the development and implementation of the Multi-State ZEV Action Plan, we write to stress the importance of ensuring that robust and binding ZEV requirements take effect in our states.

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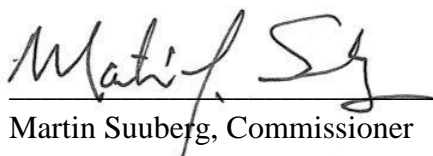
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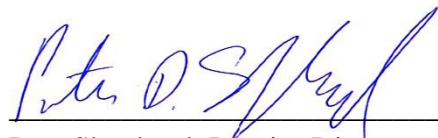
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Pete Shepherd, Interim Director
Oregon Department of Environmental Quality



Janet Coit, Director
Rhode Island Department of Environmental Management



Deb Markowitz, Secretary
Vermont Agency of Natural Resources

July 20, 2016

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: ZEV Requirements in Section 177 States

Dear Daniel Sperling:

As lead environmental agency officials in states that are implementing the California Advanced Clean Cars rules, including the Zero Emission Vehicle (ZEV) requirements, and who are partners with California in the development and implementation of the Multi-State ZEV Action Plan, we write to stress the importance of ensuring that robust and binding ZEV requirements take effect in our states.

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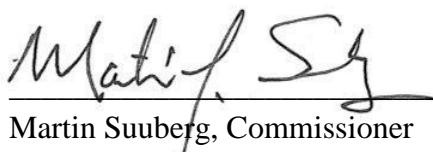
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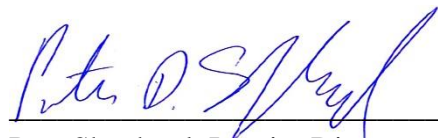
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Pete Shepherd, Interim Director
Oregon Department of Environmental Quality



Janet Coit, Director
Rhode Island Department of Environmental Management



Deb Markowitz, Secretary
Vermont Agency of Natural Resources

July 20, 2016

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: ZEV Requirements in Section 177 States

Dear Diane Takvorian:

As lead environmental agency officials in states that are implementing the California Advanced Clean Cars rules, including the Zero Emission Vehicle (ZEV) requirements, and who are partners with California in the development and implementation of the Multi-State ZEV Action Plan, we write to stress the importance of ensuring that robust and binding ZEV requirements take effect in our states.

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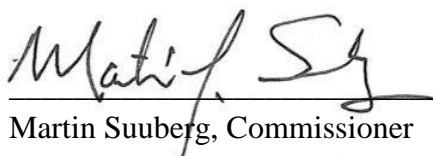
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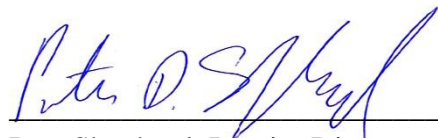
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