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California Air Resources Board
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Submitted online at: https://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=sp2030disc-dec16-ws&comm_period=1

December 12, 2016

Re: Comments on the 2030 Target Scoping Plan Discussion Draft

Dear Chair Nichols:

Thank you for the opportunity to provide comments on the 2030 Target Scoping Plan Discussion Draft, as required by the Global Warming Solutions Act of 2006 (AB32)¹ and further directives and legislation that outline specifications, such as Executive Order B-30-15, Senate Bill 32 (SB32) and Assembly Bill 197 (AB197). AB32 requires this scoping plan be updated at least every five years, while the Executive Order B-30-15 establishes a midterm greenhouse gas emissions reduction target of 40% below 1990 levels by 2030, and that the AB32 Scoping Plan be updated to incorporate the 2030 greenhouse gas target that was codified by SB32.²

Plug In America is the national consumer voice for plug-in electric vehicles (PEVs) and works to promote policies and programs nationwide that put more PEVs on the road for all consumers.³ Our members are passionate PEV advocates and have driven PEVs for many years, affording Plug in America a unique perspective on how consumers think about PEVs and what actually inspires a consumer to purchase a PEV. Our comments pertain to the adoption of PEVs within the 2030 Target Scoping Plan Discussion Draft.

As we outlined in our comments to the ARB on the 2030 Draft Scoping Plans, there are multiple benefits from the adoption of PEVs. These benefits accrue to all citizens, regardless of who may purchase the car or the type of PEV purchased. PEVs include battery-electric vehicles (BEVs) and plug-in hybrid electric vehicles (PHEVs). The BEVs are charged by electricity from the local grid, while PHEVs drive on electricity from the local grid first, then on gasoline for longer trips. Plug In America's mission is to promote the accelerated adoption of PEVs across California and the rest of the United States in order to achieve these benefits for all.

1 Text of AB32: http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab_0001-0050/ab_32_bill_20060927_chaptered.html

2 <https://www.arb.ca.gov/cc/scopingplan/meetings/110716/scopingplanpresentation.pdf>

3 More information available at: www.pluginamerica.org



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2030 Target Scoping Plan Comments

We firmly applaud the ARB in the inclusion of the vehicle technology goal: “Through a strong set of complementary policies – including reliable incentives, significant infrastructure investment, broad education and outreach, and potential regulation – aim to reach 100 percent ZEV sales.”⁴ This is exactly the bold action that California must take to reduce the greenhouse gas emissions from the transportation sector. With the inclusion of this vehicle technology goal, California would continue to be the nationwide leader in establishing strong policies that support the adoption of more PEVs on the road.

As mentioned in our comments to the 2030 Draft Scoping Plan, several countries have recently taken a bold step in moving towards the phase-out of light-duty internal combustion engine (ICE) vehicles by 2030 or sooner. In Germany, the German Bundesrat (Federal Council), recently passed a bi-partisan agreement that starts the process to ban ICE car sales in 2030 by implementing a mix of tax strategies and financial incentives. This would essentially only allow for PEVs and other zero emission cars to be registered going forward in 2030, if adopted by the full German Parliament.⁵

Similar to Germany, the Norwegian National Transport Plan explores options to make ICE vehicle ownership not cost effective through higher taxes on owning an ICE, and additional incentives for PEVs.⁶ Dutch politicians have also put forward a proposal that would ban the sale of ICEs completely in the Netherlands by 2025.⁷

The cities of Athens, Paris, Madrid and Mexico City also recently made a joint announcement at the C40 Mayors Summit to remove diesel vehicles from their roads by 2025 in order to improve the air quality for their citizens. As part of the pledge, the cities will incentivize alternative vehicles, including PEVs. The media release states, “Worldwide, 3 million deaths each year are linked to exposure to outdoor air pollution according to WHO, with the vast majority of these deaths occurring in cities.”⁸

Through a suite of policy mechanisms including a purchase incentive at the point of sale, HOV lane access policies, a financing program for low-income consumers, dealer training, fair license and registration policies, charging infrastructure incentives, and the proper EV charging rates, California can achieve the goal of 100 percent ZEV sales by the 2030 timeframe.

⁴ See page 52: https://www.arb.ca.gov/cc/scopingplan/2030target_sp_dd120216.pdf

⁵ More information, including the link to the actual German resolution (in German) is found here: <http://arstechnica.com/cars/2016/10/germanys-bundesrat-votes-to-ban-the-internal-combustion-engine-by-2030/>

⁶ <http://www.ntp.dep.no/English>

⁷ <https://cleantechnica.com/2016/04/06/dutch-politicians-call-for-ban-of-all-new-gas-diesel-cars-by-2025/>

⁸ http://www.c40.org/press_releases/daring-cities-make-bold-air-quality-commitment-to-remove-all-diesel-vehicles-by-2025



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In addition, we commend the ARB for the inclusion of the VMT reduction goal that aims to “promote potential efficiency gains from autonomous transportation systems and identify policy priorities to maximize sustainable outcomes from autonomous vehicles (preferably ZEVs), including VMT reduction, coordination with transit, and shared mobility.” However, we strongly encourage that these autonomous vehicles be required to be PEVs, not just “preferred”. The price of battery technology is dropping significantly for PEVs, leading to the cost parity between these vehicles and comparable internal combustion vehicles to be attained in a few years – a fact that the ARB notes in the Draft Scoping Plan.⁹ **The ARB should set the requirement right from the start that these autonomous vehicles should be PEVs.**

The formal adoption of these goals will tremendously help to accelerate the adoption of PEVs and achieve a 40% reduction in GHG emissions by 2030. Please send any questions to Katherine Stainken, Policy Director, at kstainken@pluginamerica.org.

We thank you for this opportunity to provide comments on the 2030 Target Scoping Plan Discussion Plan, and look forward to working with you.

Best regards,

A handwritten signature in blue ink that reads "Joel Levin".

Joel Levin
Executive Director
Plug In America

⁹ Page 50 of the Draft Scoping Plan notes: “The growing severity of climate impacts, persistent public health impacts and costs from air pollution, and rapid technology progress that supports the expectation that cost parity between some ZEVs and comparable internal combustion vehicles will be attained in a few years underscores the need for further action on ZEVs.”
https://www.arb.ca.gov/cc/scopingplan/2030target_sp_dd120216.pdf