



Consumer Federation of America

**Comments of
The Consumer Federation of America
to the Colorado Air Quality Control Commission
on
Urging Inclusion of a Zero Emissions Vehicle (ZEV) Program
in The Department of Public Health and Environment's Proposal
to Adopt a Low Emissions Vehicle Program**

August 16, 2018

The Consumer Federation of America applauds the state of Colorado for moving ahead to adopt the Clean Car standards under Section 177 of the Clean Air Act, and that the CO Air Quality Control Commission is considering the Colorado Department of Public Health and Environment's proposal today to begin the public notice process. In addition to becoming a Clean Car State, we strongly believe Colorado should also participate in the Zero Emissions Vehicle (ZEV) program. This will further benefit the health, well-being and pocketbooks of Colorado consumers.

By joining the ZEV program, Colorado will play a leading role in creating an important market for zero emission vehicles, and open up opportunities for Coloradoans to purchase a wide variety of ZEV vehicles.

More than two decades ago, when California launched the Low Emission Vehicle (LEV) program, which helped to jump-start the hybrid market, many predicted it would be a costly failure. But just the opposite happened—the LEV program helped to stimulate the hybrid vehicle market. Today, hybrids are a successful, profitable and popular product, representing 5% of the overall automotive market with millions of vehicles sold. Most automakers now offer hybrids in a broad range of popular vehicles types.

Given the success of the LEV program and its impact on the development of clean cars and the environment, it is not surprising to find that today's electric vehicles (ZEVs) got off to an even faster start than hybrids in popularity and are currently following their adoption rate. Electric vehicles are making sense to millions of Americans in spite of today's relatively low gas prices. In fact, CFA estimates that ZEV sales will rise 71 percent from 2017, to a new all-time high of 342,000 vehicles sold. (See Figure 1)

In addition, the number of makes and models available today is larger than the number of hybrid makes and models that were available in the early years of the hybrid experience. In spite of a decade's head start, there are about the same number of EV and PHEVs available as 43 hybrid models (42 vs. 43) and another 50 models expected to be rolled out by 2025 alone. By

adopting the ZEV program, Colorado will contribute significantly to the demand for electric vehicles which will contribute to both better pricing and better technology.

Based on the historical experience of hybrids, which was aided by the forward-looking LEV program, the targets set for the ZEV program are certainly achievable, especially with a decision by Colorado to adopt the program. By participating in the ZEV program, Colorado would be signaling strong popular support for policies that promote greater energy efficiency of vehicles and state level action to reduce auto emissions.

Ten states, representing over a quarter of the U.S. auto-buying market, have already joined forces to push for more zero-emission vehicles (ZEVs). Their goal: to make ZEVs 8 percent of the automotive market in their states by 2025. Governors from California, Connecticut, Maine, Maryland, Massachusetts, New Jersey, New York, Oregon, Rhode Island and Vermont are pledging to take specific steps to promote the use of electric cars and trucks, plug-in hybrids, and hydrogen-powered vehicles. These governors have pledged to include these vehicles in their public fleets, and to create new incentives to promote ZEVs. They have promised to promote lower electricity rates for home vehicle-charging systems, develop common standards for roadway signs and charging networks, and harmonize building codes to make it easier to build new electric-car charging stations.

By joining with these ten forward-looking states, Colorado will help accelerate the growth of the national market for the latest clean and efficient cars. In addition, by contributing to the acceleration of electric vehicle sales, Colorado will also be helping ensure that U.S. automakers get the edge they need to compete in the global auto market.

Coloradoans are known as innovative, independent Americans, and adopting the ZEV program is certainly in keeping with their historical concern about the environment and the clean mountain air for which the Rocky Mountain state is famous.

