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Arthur N. Marin, Executive Director

July 31, 2013

Mr. Sarim Baig, Contract Specialist
U.S. General Services Administration
Federal Acquisition Services – QMAAA
1800 F Street, NW
Washington, DC 20405

Re: Request for Information QMAA-JC-130021-D

Mr. Baig:

Thank you for the opportunity to comment on the Vector II vehicle acquisition concept. On behalf of our seven member states that are implementing the California zero emission vehicle (ZEV) Program pursuant to Section 177 of the Clean Air Act, we commend GSA and DOD on this innovative plan. We believe the envisioned acquisition strategy will provide benefits to DOD fleet operators and employees in the form of reduced cost of ownership and reduction of harmful air pollution at and near DOD facilities. The strategy will also benefit vehicle manufacturers and charging equipment providers, while contributing to lower prices and broader deployment of these critical energy-saving technologies. Finally, the strategy will assist manufacturers in complying with their obligations under our states' ZEV programs; this in turn will contribute to the success of these programs.

We are committed to supporting manufacturers' efforts to comply with the ZEV regulations, as evidenced by the myriad actions our states have taken to promote the deployment of charging infrastructure, and to reduce the cost of ZEV ownership through monetary and non-monetary incentives. In the same spirit, we strongly support the efforts of GSA to negotiate large-scale purchase contracts that will benefit manufacturers and consumers alike. Successful implementation of Vector II will likely encourage other large fleet operators to consider similar measures. Plug-in vehicle sales in our states have increased dramatically in just the past two years. We believe that GSA's proposal could complement and accelerate these already promising sales trends.

We would like to note two technical points. First, the "travel" provision of the ZEV rule does not preclude early ZEV placement in the §177 states. This provision reduces the overall number of ZEVs that manufacturers are required to sell, but the vehicles that are sold will earn the same amount of credit whether placed in California or any other ZEV program state. While the combination of "travel" and the Optional Compliance Path (OCP) adds complexity to the calculation of individual manufacturers' obligations, there is nevertheless a specific ZEV credit obligation that can be clearly determined for each manufacturer in each year. Thus, Vector II should still provide an attractive opportunity even for manufacturers that choose the OCP or choose to "travel" credits.

We also note that in order for manufacturers to receive full credit under the ZEV programs, eligible vehicles must be registered with the individual state's department of motor vehicles. It is our understanding that many fleet vehicles in use at DOD facilities are registered with the federal government and not the state in which the facility is located. We don't believe that this will present an insurmountable hurdle to successful implementation of Vector II. However, assignment of ZEV program credit for vehicles purchased under Vector II will require either that the vehicles be registered by the state DMV, or that some other measure be taken to recognize and appropriately credit these vehicles. We welcome a chance to review these registration requirements with GSA and DOD, and to discuss ways to ensure that due credit is granted and that all state and federal requirements are met.

Sincerely,

Arthur N. Marin
Executive Director

cc: NESCAUM Directors