



July 30, 2019

Air Quality Control Commission
4300 Cherry Creek Drive South,
Denver, CO 80246

Dear Chairman Butler and Commissioners of the Air Quality Control Commission,

As businesses, employers, institutions, investors, and residents of Colorado, we strongly support the adoption of the Advanced Clean Cars (ACC) program by the state. The ACC program would boost Colorado's economy by creating fuel and electricity cost savings for consumers and businesses, cutting health costs by reducing smog-forming emissions, and reducing greenhouse gas (GHG) emissions. Cleaner, more efficient vehicles help organizations like ours cut costs, avoid the volatility of fossil fuel prices, and achieve our climate goals.

We applaud your adoption of the Low Emission Vehicle (LEV) standard, which limits GHG and smog-forming pollutant emissions from light-duty vehicles. The LEV standard will provide an important backstop to the federal vehicle GHG emission standards that are currently under attack. By increasing the availability of clean vehicles in Colorado, these standards will provide Coloradans with a broad set of positive outcomes and generate significant benefits for our bottom line.

Recent actions and announcements from the global auto industry indicate increased investments in electric vehicles (EVs). However, in order to ensure the transition to electrification, which is necessary in order to meet climate goals, we need strong policies in place. Colorado can play an important role in ensuring that we move in the right direction. To date, ten states have adopted the ACC program in full, including both the LEV standard and the Zero Emission Vehicle (ZEV) program. By requiring that approximately 7 percent of new sales be zero emission or plug in EVs by 2025, the ZEV program will help organizations like ours and all Coloradans save money on fuel and maintenance, ensure a broader range of EV choices, and drive additional pollution reductions. [Analysis](#) has found that adoption of the ZEV program would result in \$7.6 billion in net benefits to the state by 2050.

Colorado is well positioned to support EV adoption. In January, Governor Jared Polis [issued an executive order](#) supporting the transition to EVs by directing the consideration of ZEV, redirecting Volkswagen settlement funds, and creating an interagency transportation electrification workgroup. In addition, former Governor Hickenlooper adopted the state's first electric vehicle plan, setting a goal of nearly a million EVs on the road by 2030. Achieving this goal will save consumers over \$500 million per year in fuel costs. The ZEV standard is a key tool for helping to achieve this goal by encouraging automakers to actively market EVs and offer a wide range of EVs in the state. Colorado's adoption of the ZEV standard would expand consumer choice and help ensure that dealers and consumers have access to EVs throughout the state.

EVs represent a significant economic opportunity for Coloradans. Forward-looking policies like the ZEV program provide companies and investors with the policy certainty that enables long-term investments in this fast-growing industry, which is even more important as we see a global shift toward EVs. Strong state leadership can help catalyze the development of new technologies in Colorado and associated local jobs, building upon the [existing](#) EV manufacturing companies in the state.

Adoption of the full ACC program would drive the availability and development of clean vehicles, resulting in significant fuel cost savings, public health benefits, and GHG emission reductions. Fleets are both a significant cost and a major contributor to company and institutional carbon footprints. EVs have lower maintenance costs and both ZEVs and LEVs have lower fuel costs, reducing the risks associated with fuel cost and supply volatility. These savings benefit not just our bottom line and our investments, but also our commuting employees, students, patients, and customers. The program would also lower electricity bills for all Colorado utility customers. Increased vehicle charging allows for greater utilization of existing generation and electric infrastructure, generating revenue that helps offset rate increases for all utility customers. A 2017 [analysis by MJ Bradley and Associates](#) found that meeting the goal of 1,000,000 EVs on the road by 2030 would drive down electric rates enough to save ratepayers \$50 million per year.

Like many leading businesses, institutions and investors across the United States, we have pledged to reduce our carbon footprints. We recognize that climate change is a business risk, and that reducing GHGs is as valuable for our bottom line as it is for the communities in which we operate. Cleaner, more efficient vehicles lower our GHG emissions while allowing us to cut operating expenses in our company fleets. Low and zero emission vehicles will also improve Colorado's air quality—with benefits for public health, tourism, and the outdoor recreation industry.

We support the reductions targets set in HB 1261, aiming to cut GHG emissions 90 percent by 2050. The federal government has proposed a significant roll back of federal vehicle GHG standards, jeopardizing our ability to meet these goals. The recently approved Xcel Colorado Energy Plan, which is expected to reduce GHG emissions by about 4.1 million tons per year, is key to meeting this goal. If the federal government rolls back the car standards and Colorado does not act, GHG emissions will increase by 3.8 million tons per year—canceling out most of the gains from Xcel's plan.

Increased deployment of EVs will be a boon to the state, through substantial cost savings and health benefits from improved air quality, and GHG emission reductions. We recognize that these benefits represent a significant economic opportunity for our organizations and urge you to adopt the full Advanced Clean Cars program. Please do not hesitate to contact us with any questions.

Thank you,

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