



**Good for the Economy.  
Good for the Environment.**

May 9, 2019

Air Quality Control Commission  
Colorado Department of Public Health and Environment  
4300 Cherry Creek Dr. South, Denver, CO 80246

RE: Support ZEV in AQCC rulemaking

Dear Air Quality Control Commissioners,

As members and allies of E2 (Environmental Entrepreneurs), and Electric Vehicle Industry Leaders in Colorado, we strongly urge the Commission to schedule a Request for Hearing in August 2019, to open a rulemaking to consider adopting the Zero Emission Vehicle (ZEV) rule for Colorado. This serves the public interest; will allow for a full, transparent, and robust discussion; and will ultimately result in better policy decisions. Furthermore, we also urge the Air Quality Control Commission to adopt the ZEV rule in their August meeting.

E2 is a national, nonpartisan group of business leaders, investors, and professionals from every sector of the economy who advocate for smart policies that are good for the economy and good for the environment. Nationally, E2 members have founded or funded more than 2,500 companies, created more than 600,000 jobs, and manage more than \$100 billion in venture and private equity capital. The Rocky Mountains chapter is in its eleventh year.

CDPHE should use its existing statutory authority to ensure the state can meet its air quality and climate goals by increasing the availability and sales of clean, electric vehicles (EV) in the state through a ZEV program. This is also consistent with Governor Polis' January 2019 Executive Order, where he made cleaner air and vehicles one of his administration's top priorities by directing state agencies to accelerate the transition toward a clean transportation future. The order directs the Colorado Department of Public Health and Environment (CDPHE) to consider adopting a ZEV program.

In light of the rollback of the Federal Clean Cars standards this summer, it is urgent Colorado charts its own path. ZEV adoption will move Colorado forward by ensuring availability of the increasing numbers of electric cars, SUVs and trucks that manufacturers are making and releasing in the coming years. Electric cars are key to significant carbon emissions and other air pollution reductions in the coming years and will ensure Colorado is at the forefront of the economic benefits of new technology investment and adoption – and will support the state's existing and growing EV and battery industries.

According to the recent [Clean Jobs Colorado 2018](#) report, Colorado is home to more than 2,700 jobs in the advanced vehicle industry, including technological innovation in lightweight materials, engine design, aerodynamics, EVs and EV charging infrastructure. Long-term standards and policy are essential to ongoing innovation and job growth, and to a further strengthen the manufacturing sector in Colorado and beyond. As a result, private investment in

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next-generation EV technology – both R&D and development and production – [is flowing at higher rates to ZEV states, and at much lower levels to non-ZEV states](#). By adopting ZEV, Coloradans can expect the jobs in this industry to continue to grow.

A recent study by [Synapse Energy Economics](#) for the years 2020 through 2035, shows pursuing the ZEV standard would result in a positive, long term economic benefit for the state – to the tune of an increase of about \$72 million in consumer spending and 1,700 jobs, annually. The economic benefits would grow over time, from the cumulative effects of less fuel consumption, lower maintenance costs, and as the cost to purchase EVs continue to come down. The ever-increasing economic benefits would extend to nearly every facet of the Colorado economy. The good news is environmental and health benefits of reduced emissions through LEV and ZEV can be achieved alongside employment and GDP growth in Colorado.

Automakers have shown they can meet and exceed the ZEV standard, which requires them to get just 7 - 9 percent of their sales from zero-emission vehicles and gives them until 2025 to do so. EV sales are already increasing in Colorado and the state can take steps to assure compliance. In some states, BMW and GM have already achieved above 10% sales level eight years ahead of schedule.

Adopting Advanced Clean Cars standards is a smart, business-first policy that will drive innovation and jobs, save consumers money, promote consumer choice and help improve the quality of our precious Colorado air. As business leaders who are creating jobs and driving economic growth in Colorado, we urge you to open a rulemaking to consider ZEV standards for Colorado.

Respectfully,

### **Electric Vehicle Industry Leaders**

Jim Burness, CEO & Founder, National Car Charging  
Joseph R. Mitchell, President & CEO, UQM Technologies Inc.  
Tim Reeser, CEO and Co-Founder, Lightning Systems  
Solid Power Battery

### **E2 Rocky Mountains Chapter members & Colorado business leaders**

Debra Brown  
Executive Director  
[Good Business Colorado](#)

Emily Applegate  
Innovation Corridor

Kate Gridley  
Owner, Atolla Energy

Christopher Riti  
Principal, Promontory Financial  
Group

Jeff Bennett  
Founder, Big Kid Science

Lauren Hafford  
Mechanical Engineer

Jamila Rockette  
Consultant

Chris Bentley  
Founder, Sustainable Pet  
Industry Association

Matthew Hamilton  
Sustainability Director, Aspen  
Skiing Company

Michael Rucker  
CEO, Scout Clean Energy

Vince Calvano  
Attorney, Vincent P. Calvano,  
LLC.

Meriwether Hardie  
Chief of Staff, BioLogical  
Capital

Frank Sandoval  
Principal, Pajarito Technologies

DJ Cardi  
VP of Client Relations, Solar  
Power Financial

Grady Harper  
Energy Rater, EnergyWise  
Consultants

Ankit Sanghvi  
Project Manager, PCL  
Construction

Rachel Carillo  
Consultant

Richard Hubler  
Planning Intern, City of Pueblo

Brad Seaman  
Director of Project Finance,  
Scout Clean Energy

John Cleland  
Managing Partner,  
RenewWest

Jerome Kalur  
Attorney at Law

Brenna Simmons-St. Onge  
Executive Director, The Alliance  
Center

Phil Combs  
M&V Engineer, Trane

Scott Koehler  
VP Global Strategy, Schneider  
Electric

Ian Skor  
Co-Founder, Sandbox Solar

Bryan Conklin  
CEO, Resurgent Energy

Sue Kunz  
CEO, ThriveOn Group

David Smith  
Director Facility Services, Kaiser  
Permanente

Rich Crawford  
CEO, Midwest Wind Resources

Rose Lew  
Environmental Scientist,  
Retired from US EPA

Michael Smith  
Founder, RenewWest

Andrew Currie  
Investor, Active Minds LLC

Theron Makley  
Sales & Marketing Consultant

Eric Stoutenburg  
Vice President of Investments,  
Renewables, MAP Royalty, Inc.

Kris Deutschman  
Founder/CEO, Deutschman  
Communications Group, Inc

Ryan Martens  
Founder, Rally Software  
Development

Karen Sweeney  
Sustainability Manager, Meidh

Pete Dignan  
Founder, Ever Better, PBC

Don Martinez  
Founder, #YearOneMovement

Stu Swineford  
Founder, Relish Studio

Dannie Dionno  
Business Development  
Specialist, ME Group

Alex Marvin  
Consultant

Kristen Tetrick  
Dir of Sustainability, Lucky's  
Market

Rachel Emmer  
Principal and Senior  
Consultant, Detritus Group

RJ Mastic  
Founder and CEO, Ecosystems

Andrew Thomaidis  
Consultant

Tanya Travis  
OTR, Welbrook

Alanna Fishman Director, Policy and Social Responsibility, HBW Resources	Kevin Morse Vice President, Lever Energy Finance	Pierre Trolin Partner, BELT Natural Resources Development
Suzanne Foster Porter Principal, Kannah Consulting	Jeni Nagle Ela Family Farms Whitney Painter Partner, Buglet Solar Electric Installation	Brad Udall Sr. Water and Climate Scientist, Colorado State University
Angie Fyfe Executive Director, ICLEI Local Gov'ts for Sustainability	John Powers President, Alliance for Sustainable Colorado	Aaron van Boer Head of Solar Bus Development, Current by GE
Billy Giblin Project Engineer, Nexant	Rochelle Rabeler Attorney, Holland & Hart LLO	Marie Venner President, Venner Consulting
RJ Harrington President, Sustainable Action Consulting, PBC	Megan Rast Corporate Sustainability Professional	Thomas Vessels President and Director, Vessels Coal Gas, Inc.
Scott Hatfield Business Development Manager, Scott Hatfield	Dave Reed Co-leader, Citizens' Climate Lobby - GJ chapter	Lou Villaire Co-owner, Atlasta Solar Center
Greg Hopkins Associate, Rocky Mountain Institute		Robert Welch President, Energy Crafters
		Susan Williams Logistics Mgr, GE Johnson Construction
		Daniel Winer Attorney