14616 Carter Road
Overland Park, KS 66221
Fax 913.685.4637

facsimile transmittal

To:	**Trans Depart, Air Quality**	Fax:	**(713) 993-4508**
From:	**Bryan Hansel**	Date:	**1/15/2009**
Re:	**Public Comments**	Pages:	**3**
Cc:			

☐ Urgent ☐ For review ☐ Please comment ☐ Please reply ☐ Please recycle

Notes: Following are our comments

SMITH
ELECTRIC VEHICLES

Comment on On-road vehicle emission reduction measure ID #7, Electric Vehicles:

Given that the Houston-Galveston-Brazoria region is working toward an attainment date of 2019 or sooner and that extensive zero-emission vehicle technologies exist, while new ones are being developed, Smith Electric Vehicles proposes that on-road control strategy ID #7 be amended to also include medium-duty and heavy-duty zero emission vehicles.

Heavy-duty vehicles are already recognized as high emitters and medium-duty vehicles, because of their large population numbers typically operating short-haul routes in urban environments, are also significant contributors to emissions of nitrogen oxides.

However, current voluntary incentive programs such as the Texas Emissions Reduction Plan and Congestion Mitigation and Air Quality funded programs tend to be structured to focus on reducing emissions from *heavy-duty, high-mileage vehicles*, **leaving emissions from medium-duty and lower mileage urban heavy-duty vehicles largely unaddressed.**

Use of medium- and heavy-duty electric trucks proves an ideal strategy for emissions reduction in populated urban areas, given that they emit no nitrogen oxides, particulate matter, or greenhouse gases and operate far more quietly than their diesel counterparts. In addition, use of electric vehicles reduces dependence on foreign oil. Because zero-emission vehicles ranging from 5,000 pounds to 26,000 pounds Gross Vehicle Weight Rate (Class 7) are currently available, **Smith Electric Vehicles is proposing that medium- and heavy-duty vehicles be included as part of the Electric Vehicle control strategy**, in order for public and private fleets in the Houston-Galveston-Brazoria region to be aware of and have access to all available and potential zero-emission vehicle technologies now and in the future.

About Smith Electric Vehicles:

Smith Electric Vehicles is the world's largest manufacturer of zero-emission vans and trucks. Smith produces a range of commercial electric vehicles with Gross Vehicle Weight Rates up to 26,000 lbs. The vehicles all have impressive acceleration, top speeds of up to 70 mph and a range on one battery charge in excess of 100 miles.

The vehicles are zero emission at the point of use, meaning no exhaust air pollutants such as nitrogen oxides or particulate matter and also no greenhouse gas emissions, such as carbon dioxide.

The product range is designed for urban applications such as deliveries, food and beverage distribution, 3PL logistics, construction, utilities, airports and public sector operations.

141616 Carter Road
Overland Park, KS 66221
913.940.8353
www.smithelectricvehicles.com

Smith has a partnership agreement with Ford to develop and produce commercial electric vehicles, utilizing the Ford chassis. Founded in 1920, Smith has a unique heritage and unparalleled expertise in the manufacture and service of commercial electric vehicles.

Smith Electric Vehicles is a trading division of The Tanfield Group Plc, which is a profitable, high growth company listed on the Alternative Investment Market (AIM) of the London Stock Exchange.

www.smithelectricvehicles.com

www.tanfieldgroup.com

Thank you for your time and attention in reviewing these comments.

Sincerely,

Bryan Hansel
CEO
Smith Electric Vehicles US