



June 18, 2005

The Honorable Robert F. Sawyer, Ph.D.  
Chairman, California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Proposed Amendments to the Emission Control and Smog Index Labels Regulations,  
2007 Board Meeting, Agenda Item #07-7-5.**

Dear Chairman Sawyer:

The undersigned organizations are pleased to submit the following comments concerning the Air Resources Board (ARB) Proposed Amendments to the Emission Control and Smog Index Labels Regulations.

Accurate consumer information is critical for the efficient operation of any market, and in the new vehicle market, pollution labeling can empower consumers to choose the cleanest cars and light trucks. The combination of robust standards and effective consumer labeling has been key to transforming markets toward products with lower environmental footprints; residential refrigerator and air conditioning energy programs are familiar examples. Similarly, a global warming emissions label on vehicles complements California's landmark standards for vehicle greenhouse gas emissions and encourages the faster adoption of the best-performing technologies.

We commend the ARB staff for a thorough and thoughtful revision of the vehicle pollution labels as required by AB 1229 (Nation, 2005). The proposed Environmental Performance labels are clear, intuitive and easy-to-read. We strongly support the label size requirement.

A consistently-formatted, 6 X 4 inch label on all vehicles helps ensure that the Environmental Performance label will clearly stand out and be easily recognized by vehicle buyers, even when shopping across different vehicle brands and models.

We urge ARB to closely monitor and update the label as necessary to keep it useful to consumers. Due primarily to California's vehicle greenhouse gas emission standards, the cars and light trucks sold in the state are expected to become cleaner on average with each model year. As a result, ARB estimates that the global warming score, in particular, will have a higher average value across the new vehicle fleet by model year 2012. This will cause global warming scores across vehicles to bunch up toward the top of the scale. The shift to cleaner vehicles may occur sooner, however, and we urge the staff to annually analyze both the smog forming and greenhouse gas emissions from each new model year and revise the label before 2012, if necessary, to ensure that vehicles with average emissions continue to be scored in the middle of the pollution scale. This ensures that dealers can differentiate and consumers can clearly identify the cleanest vehicles with each new model year.

Thank you for your efforts with this regulation and your consideration of these comments.

Sincerely,

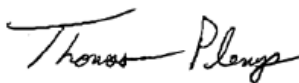


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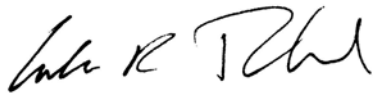
Jason Barbose  
Environment California



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Susan Frank  
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Luke Tonachel  
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