

January 25, 2012

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, California 95814

Subject: Advanced Clean Cars Regulations – Comment to the Criteria Section of ARB's LEV III Proposal

Dear Air Resources Board Members:

Toyota supports California's goals of meeting ambient air quality standards through the development of the Advanced Clean Cars (ACC) program. Toyota understands ARB has created the ACC program, which combines the control of criteria and greenhouse gas emissions into a single coordinated package of requirements for MYs 2015-2025. The breadth of the ACC program's ambitious goals requires a clear recognition of the multiple challenges faced by those who will be working to accomplish the goals of the proposed regulations. Such challenges can only be successfully met with adequate flexibility, such as appropriate lead-time and phase-in, and we appreciate every instance where ARB staff has acknowledged and provided for this practical necessity.

Toyota has been working with the Alliance of Automobile Manufacturers (Alliance) to develop a comprehensive set of comments related to the Criteria Section of ARB's LEV III Proposal. Toyota recognizes and supports ARB's LEV III Proposal for Criteria emissions, subject to the recommendations contained in the Alliance comments. In this letter, as a supplement to the Alliance comments, Toyota would like to provide additional comment on some key points related to the Criteria Section of ARB's LEV III proposal.

- **Allow adequate phase-in time for 150K on non-pzev SULEVs**

The 12/7/11 ISOR requires non-pzev SULEVs to convert 100% to 150K durability in the first year of LEV III - 2015 MY, with no phase-in provided. In our assessment, this would create a disproportionate burden in the very first year of LEV III to manufacturers who have significant numbers of such SULEVs. Toyota would like to reinforce the Alliance's request to allow at least until 2017 MY for non-pzev SULEVs to phase-in to 150K, instead of 100% in 2015 MY. An extension by at least two years would provide much needed lead-time and flexibility for non-pzev SULEVs to phase-in from 120K to 150K durability.

- **Need for a formal technical review for any PM standard below 3 mg/mi**

ARB's proposed phase-in of 3 mg/mile FTP PM standards beginning in 2017 MY will be very challenging, due to technical issues such as measurement technology. More concerning, is ARB's proposal to set a 1 mg/mi standard in 2025 MY. Toyota strongly supports the Alliance comment for a thorough formal technical review for any proposed PM standard after the 3 mg/mi standard. Once that review is done, then ARB could develop and propose standards for 2025 MY and later based on the findings of the PM technical review.

Thank you for your consideration of our and the Alliance comments to the Criteria Section of the proposed LEV III regulations.

Best regards,



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