



Union of Concerned Scientists
Citizens and Scientists for Environmental Solutions



Ms. Mary Nichols, Chair and Board Members
Mr. James Goldstene
California Air Resources Board
1001 I Street
Sacramento, CA 95814

cc: A. Bevan
L. Crowell
J. Wong
C. Childers
T. Cackette

Subject: Hybrid Vehicle Exhaust Test Procedures for Plug-in Hybrid Vehicles

Dear Ms. Nichols, Mr. Goldstene and Board Members

The Union of Concerned Scientists (UCS) is pleased to offer comments on the Hybrid Vehicle Exhaust Test Procedures section of the Initial Statement of Reasons prepared by the Air Resources Board staff in the Zero Emission Vehicle Program.

Overall, we support the new exhaust test procedures and feel that they are a good first step at measuring the emissions of the plug-in hybrid vehicles (PHEVs). However, at this time, the accuracy and consistency of the procedures can not be confirmed because no major automotive company has produced a PHEV for testing.

Furthermore, because other organizations, such as the Society of Automotive Engineers (SAE) and US Environmental Protection Agency, have yet to finalize their hybrid vehicle test procedures, there may be a lack of uniformity between the procedures which may lead to inconsistent results and increased testing costs.

For these reasons, we strongly recommend that the Board approve the Hybrid Exhaust Test Procedures portion of the regulation, but have the staff report back to the Board within three years on their effectiveness and accuracy. The future appraisal should also include an evaluation of the Evaporative Test Procedures, and the proposed shortened All-Electric Range Determination Test Procedures (SAE J2572) using actual test data from hydrogen fuel cell vehicles.

Once again, you and your staff should be commended on the excellent work done on these Hybrid Vehicle Exhaust Emissions Test Procedures. I look forward to working with you in the future on them, and please contact me with any questions.

Sincerely,



Spencer Quong
Union of Concerned Scientists

Tim Carmichael
Coalition for Clean Air

Danielle Fugere
Friends of the Earth

Daniel Emmett
Energy Independence Now

Bernadette Del Chiaro
Caitlyn Toombs
Environment California

John Shears
Center for Energy Efficiency and Renewable Technologies